

**Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58**

Project Information

Project Name: 1251-S.-Eliseo-Dr

HEROS Number: 900000010251166

Responsible Entity (RE): MARIN COUNTY, CIVIC CENTER SAN RAFAEL CA, 94903

RE Preparer: Molly Kron

State / Local Identifier: ECS Homekey S Eliseo

Certifying Officer: Matthew Hymel

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): Environmental Science Associates

Point of Contact: Elliott Schwimmer

Project Location: 1251 S Eliseo Dr, Greenbrae, CA 94904

Additional Location Information:

N/A

Direct Comments to: Housing and Federal Grants Division, County of Marin,
Community Development Agency, via E-mail at
federalgrants@marincounty.org

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

1251 S. Eliseo LLC, an affiliate of Episcopal Community Services, with federal funding provided through the State of California's Homekey program, as well as through federal funding from the Department of Housing and Urban Development (HUD), proposes to convert a skilled nursing facility at 1251 South Eliseo Drive in Larkspur, California, for use as housing facility for currently homeless individuals and those at risk of homelessness. The existing building at 1251 South Eliseo Drive (APN 022-212-28) is a 43-unit former skilled nursing facility built circa 1969 in the City of Larkspur, California, in the County of Marin. The 1.3-acre project site is situated along the north bank of Corte Madera Creek. The project site slopes approximately 1.5 percent to the east. The project would entail rehabilitation of the interior of the existing building, which contains 43 patient rooms in the form of efficiency residential units, as well as a recreation room, kitchen, and office space. The project would entail a near-gut rehabilitation of the existing 43 rooms, with some plumbing expansion within the existing private bathrooms to provide showers/baths each unit. The existing commercial kitchen and the remaining space would be converted into a community dining room and activity rooms, services offices, and wellness areas. One additional room would be provided for staff staying overnight, for a total of 44 rooms. Project Homekey was implemented by the state in 2020 to create opportunities for state, regional, and local public entities to develop a broad range of housing types, including but not limited to hotels, motels, hostels, single-family homes and multifamily apartments, adult residential facilities, and manufactured housing, and to convert commercial properties and other existing buildings to permanent or interim housing for persons experiencing homelessness or at risk of homelessness, and who are, thereby, inherently impacted by COVID-19 and other communicable diseases. Administered by the California Department of Housing and Community Development, Project Homekey is funded by federal COVID-19 relief monies.

Parking and Circulation The project site currently contains a surface parking lot with approximately 34 spaces. The parking lot would be resurfaced and restriped, but the total number of vehicle parking spaces would not change. Twenty-three bicycle racks would be added, capable of accommodating 46 bicycles.

Construction The proposed project would consist of interior renovation of the existing building and would not require excavation or demolition of external building components, other than limited ground disturbance of previously disturbed soil for repaving and other improvements in the existing surface parking lot. Areas around the building and in the parking lot would be re-landscaped with drought-resistance species. The project site contains approximately 12 trees, mostly along Corte Madera Creek. Two trees, one in a central courtyard and the other at the street frontage, would be removed. The remaining 10 trees near Corte Madera Creek would be retained as part of project implementation. Trees to be removed would not be within the wetland or riparian areas. Construction is anticipated to take place over approximately 12 months.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

Many studies show that providing housing to individuals and families experiencing homelessness yields higher housing retention rates, reduces the use of costly crisis services and institutions, and helps people achieve better health and social outcomes. In particular, this approach aims to provide stable housing as a prerequisite for effective psychiatric and substance abuse treatment and for improving quality of life. Once stably housed, individuals are better able to take advantage of available services

to stay housed, gain employment, and recover from addiction. Episcopal Community Services seeks to provide essential services to individuals and families experiencing homelessness. To that end, the proposed project would provide supportive housing as a solution to chronic homelessness, using funds from a second round of Project Homekey, a State of California program to protect Californians experiencing homelessness who are at high risk of serious illness and impacted by COVID-19. HUD would also provide immediate funding for this project, with long-term funding provided by the County of Marin.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The approximately 1.3-acre project site is located on the south side of South Eliseo Drive, east of Bon Air Road, north of Corte Madera Creek, and west of Hamilton Park. The site is less than 0.2 mile south of MarinHealth Medical Center (formerly Marin General Hospital). The site is relatively level, with surface elevations ranging from about 9 to 10 feet above mean sea level. The project site contains a single-story, 26,568-square-foot building built circa 1969. The site contains approximately 34 parking spaces. The building was originally designed and operated as an approximately 100 bed convalescent hospital. In the 2000s it was operated as a 40-bed residential center (plus room for up to 10 children) for women undergoing drug and/or alcohol abuse recovery. This facility closed in 2010 and the building has remained vacant since. In 2014, the Larkspur Planning Commission approved an application to allow interior remodeling and operation of a 70-bed skilled nursing facility, with limited, generally cosmetic, exterior improvements. However, this project was not undertaken and the approval expired in 2016. The immediate vicinity of the project site is characterized primarily by medical office uses, with multi-family residential uses to the east along the south side of South Eliseo Drive, east of Hamilton Park. There are additional multi-family residential buildings farther east, on both sides of South Eliseo Drive; to the north, on Corte Real and Bayview Road; and to the south, across Corte Madera Creek. The nearest single-family homes are approximately 425 feet north of the site, on Bayview Road (unincorporated Marin County); and about 650 feet west-northwest, on Harvard Drive (in Larkspur, on the south side of Corte Madera Creek and west of Bon Air Road). Within less than one mile of the project site are Bon Air Shopping Center (with a supermarket, pharmacy, and other stores) and Hal Brown Park, a 27-acre Marin County park (with children's playground, walking paths, a large turf area, a wellness grove of medicinal plants, a labyrinth, and an amphitheater for community music and theater, as well as the above-noted medical center).

Maps, photographs, and other documentation of project location and description:[IMG7891.JPG](#)[IMG7888.JPG](#)[IMG7887.JPG](#)[IMG7886.JPG](#)[IMG7840.JPG](#)**Determination:**

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:[EA FONSI ECS S Eliseo SIGNED.pdf](#)

**7015.15 certified by Certifying Officer
on:**

**7015.16 certified by Authorizing Officer
on:**

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
CD5054ECS	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)
TBD	Public Housing	Project-Based Voucher Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$500,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$26,255,292.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The San Rafael Airport is located approximately 5 miles to the north. This airport does not have an adopted airport land use compatibility plan. Moreover, the proposed project would not be affected by the San Rafael Airport due to the substantial distance between the airport and the project site. Gness Field is a publicly owned airport more than 13 miles north of the project site. The project site is well outside the boundaries of the Gness Field safety zones as depicted in Figure 3.1, Safety Zones, Gness Field (see p. 3.13 in source document 1). There are no active military airfields in Marin County or the nearby vicinity; therefore, no military airfield Airport Protection Zone or Clear Zone would affect the proposed project.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, the project site is not within a Coastal Barrier Resource System (CBRS) Unit, or CBRS buffer zones, as defined under the Coastal Barrier Resources Act of 1982 (PL 97-348), as amended by the Coastal Barrier Improvement Act of 1990 (PL 101-591). This project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The Federal Emergency Management Agency (FEMA) is responsible for delineating areas that are expected to be subject to flooding during a 100-year flood event. A 100-year flood event is defined as the area that is expected to

	<p>be inundated by flood flows during a rainfall event that would have an annual probability of occurrence of one percent. FEMA refers to the portion of the floodplain or coastal area that is at risk from floods of this magnitude as Special Flood Hazard Areas. FEMA creates and maintains Flood Insurance Rate Maps (FIRMs) which identify areas located within a 100-year floodplain boundary area. Based on FEMA flood hazard mapping, the project site is in Zone X - 0.2 Percent Annual Chance Flood Hazard, which is the 500-year floodplain; however, a small portion of the property is located in Zone AE - Areas subject to inundation by the 1-percent-annual-chance flood event, which is the 100-year floodplain. The Zone AE designation is a Special Flood Hazard Area with low flood risk. Therefore, the structure or insurable property is located in a FEMA-designated Special Flood Hazard Area. Because portions of the project site are within the 100-year floodplain, analysis under the eight-step process pursuant to Executive Order 11988 is required, and the project sponsor would obtain Flood Insurance pursuant to the Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994. The eight-step process is discussed further under "Floodplain Management." The community is participating in the National Flood Insurance Program. For loans, loan insurance or guarantees, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the National Flood Insurance Program, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be</p>
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		<p>continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. With flood insurance the project is in compliance with flood insurance requirements.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Comparison to Federal General Conformity De Minimis Levels The modeling results indicate that maximum annual emissions from construction would be approximately: * 0.5 tons per year of nitrogen oxides (NOx); * 0.05 tons per year of particulate matter (PM10); * 0.03 tons per year of fine particulate matter (PM2.5); and * 0.7 tons per year of carbon monoxide (CO). Based on the San Francisco Bay Area Air Basin's designation status as marginal nonattainment for ozone, moderate nonattainment for PM2.5, and maintenance for CO, federal de minimis levels would be 100 tons per year for each of these pollutants or their precursors (ROG, NOX, PM2.5, and CO). A conformity determination would be required for each criteria pollutant or precursor exceeding the federal General Conformity de minimis level. Emissions of ROG, NOX, PM2.5, and CO from construction would be below the federal General Conformity de minimis levels pursuant to the 1990 amendments to the Federal Clean Air Act. Results from CalEEMod indicate that annual emissions from the operation of the project would be approximately: * 0.07 tons per year of NOx; * 0.07 tons per year of PM10; * 0.02 tons per year of PM2.5; and * 0.6 tons per year of CO. Operational emissions would also be below the federal de minimis level of 100 tons per</p>

		<p>year for ROG, NOX, PM2.5, and CO. Therefore, the Proposed Action is exempt from General Conformity regulations. Comparison to Bay Area Air Quality Management District Thresholds The modeling results indicate that the average daily emissions from construction, excluding fugitive dust, would be: * 2.4 pounds per day of ROG (threshold is 54 pounds per day of ROG and NOX); * 5.0 pounds per day of NOX (threshold is 54 pounds per day of ROG and NOX); * 0.3 pound per day of exhaust PM10 (threshold is 54 pounds per day of exhaust PM2.5); and * 0.2 pound per day of exhaust PM2.5 (threshold is 82 pounds per day of exhaust PM10). It is important to note that BAAQMD only considers exhaust particulate matter in its thresholds of significance and emphasizes implementation of its basic and enhanced construction mitigation control measures to ensure that fugitive dust impacts are reduced to a less than significant level. Results from CalEEMod indicate that maximum annual and average daily emissions from the operation of the project would be: * 0.17 ton per year / 0.93 pounds per day of ROG (threshold is 10 tons per year / 54 pounds per day of ROG and NOX (each); * 0.07 ton per year / 0.38 pounds per day of NOX (threshold is 10 tons per year / 54 pounds per day of ROG and NOX (each); * 0.07 tons per year / 0.38 pounds per day of total PM10 (threshold is 10 tons per year / 54 pounds per day of exhaust PM2.5); and * 0.02 tons per year / 0.11 pounds per day of total PM2.5 (Threshold is 15 tons per year / 82 pounds per day of exhaust PM10). Consequently, criteria pollutant emissions from construction and operation of the project would not exceed BAAQMD's thresholds of</p>
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		<p>significance and no mitigation would be required. Given that (1) the project's construction-related exhaust emissions of PM10 (a conservative proxy for diesel particulate matter [DPM]) are substantially below the BAAQMD-published thresholds of significance of 80 pounds per day, (2) the substantial existing proportion of the construction equipment fleet within the Bay Area that have Tier 4 engines, which have advanced emission-control technologies, and (3) the proposed project consists of rehabilitation of an existing building and would involve minimal ground disturbance or diesel-powered off-road equipment, the project would not result in significant adverse risks to community health from construction activities. The project is in compliance with the Clean Air Act.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project site is not within a Coastal Zone Management Area managed by the California Coastal Commission. However, the project site is adjacent to Corte Madera Creek, which is within the Bay Conservation and Development Commission's (BCDC) jurisdiction. However, the project site itself is not within BCDC jurisdiction, as explained below. BCDC exercises authority under Coastal Zone Management Act for activities receiving federal funding, such as the proposed project, and has jurisdiction over the Corte Madera Creek. BCDC's jurisdiction extends to five feet above mean sea level in areas of tidal marsh, which the project site is adjacent to. The project sponsor undertook a site survey in October 2021 to determine the elevation of the project site. The survey determined the lowest adjacent grade to the building footprint is 8.8 feet North American Vertical Datum of 1988 (NAVD88), and the lowest grade within the property is</p>

		5.7 feet NAVD88. Therefore, the project site--and the property--are not within BCDC jurisdiction, and no permits from the BCDC are required. Therefore, the project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site includes an existing single-story building, which formerly served as a 43-unit skilled nursing facility, and a paved parking lot with 34 spaces; therefore, the site consists entirely of developed and disturbed habitat, except for landscape vegetation and trees that have been planted as part of the site's development. Although the federally endangered salt marsh harvest mouse (<i>Reithrodontomys raviventris</i>) and California Ridgway's rail (<i>Rallus obsoletus obsoletus</i>) have been documented in coastal saltmarsh habitat 0.15 mile northwest and 0.3 mile southeast of the project site, there is no suitable coastal saltmarsh or other habitat present at the project site that could support these species, even on a transient basis. No federally designated critical habitats are documented within the project site. No effects on federally listed species or critical habitat are anticipated from the project. Therefore, the project is in compliance with the Endangered Species Act.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project does not involve explosive or flammable materials or operations. There is no visual evidence or indication of unobstructed or unshielded above ground storage tanks (fuel oil, gasoline, propane, etc.) at or immediately adjacent to the project site. The nearest above-ground storage tanks (ASTs) are between 0.5 to 1 mile from the project site. These include 0 Stadium Way, which contains a 5,000 gallon tank and

		<p>has an acceptable separation distance of 541 feet for people and 106 feet for buildings; Sanitary District Pump Station 15, which contains a 6,000 gallon diesel fuel tank and has an acceptable separation distance of 584 feet for people and 116 feet for buildings; and the Marin Municipal Water District Corporation Yard at 220 Tamal Vista Boulevard, which contains a 15,000 gallon tank and has an acceptable separation distance of 855 feet for people and 176 feet for buildings. Because the project site is between 3,860 and 5,053 feet from these ASTs and is separated by numerous buildings, it is located at an acceptable distance from these ASTs. Thus, no explosive hazard to the project site would occur. Therefore, the project is in compliance with explosive and flammable hazard requirements.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project site is classified by the California Department of Conservation as "Urban and Built-Up Land;" therefore, the project would not affect farmlands regulated under the Farmland Protection Policy Act (7 U.S.C. 4201 et seq, implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended). As such, the project is in compliance with the Farmland Protection Policy Act.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>As discussed under Flood Insurance, based on FEMA flood mapping, the project site is in Zone X - 0.2 Percent Annual Chance Flood Hazard, which is the 500-year floodplain, and a small portion of the property is located in Zone AE - Areas subject to inundation by the 1-percent-annual-chance flood event, which is the 100-year floodplain. The Zone AE designation is a Special Flood Hazard Area with low flood risk. Since a portion of the project site is within the 100-year floodplain, the</p>

		<p>eight-step decision-making process was completed for the proposed project. As outlined in the decision-making process, a public notice describing the project and its location within a floodplain was published in the Marin County Independent Journal, a newspaper of general circulation in the project area, on March 17, 2022 and March 28, 2022. The second notice requested that comments be received by April 12, 2022, allowing the required 15 calendar days for public comment. Forty-three comments were received in response to the public notice. Commenters noted the site is subject to occasional flooding, that alternative sites are available, and that the project could impact wildlife, water quality, and public safety (potential to increase crime). As outlined in the decision-making process, alternatives to using HUD funds for a project located within the 100-year floodplain were evaluated. The following alternatives were considered: locate the project outside of the floodplain; alternative project site configuration, and a no action alternative that serves the same purpose. Based on the analysis in this EA, it is determined that the proposed project would not have impacts to natural or aquatic resources as the proposed improvements are located in previously disturbed areas. The project site and surrounding area are characterized by urban development and thus lack natural floodplain values and functions. Furthermore, the proposed project would not significantly increase the risk of loss of life and property because the primary and emergency access to the rehabilitated structure would occur outside of the floodplain. The County reevaluated the alternatives based on the project</p>
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		<p>impacts and determined that there is no practicable alternative to locating the project on a site in which a portion is in the floodplain. This is due to: 1) the need to locate the project on land accessible to the project sponsor/County; 2) the need to construct an economically feasible project, which is accomplished by reusing an existing structure; 3) the site's access to services and amenities (i.e. public transportation); 4) the ability to develop the project at the proposed site with no significant increased risk to life or property loss; and 6) the previously disturbed nature of the site and lack of natural floodplain values and functions. The proposed project would include storm shutters for windows and doors, which would decrease the possibility of damage from storms, and would be required to purchase flood insurance for the property. Therefore, with the 8-Step Process, the project will be in compliance with Executive Order 11988.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>The project site is constructed on artificial fill over marshland reclaimed in the 1960s. The results of the background research indicate that the project site has a low potential for precontact and historic-era archaeological resources. The proposed project would comply with Larkspur Municipal Code Chapter 15.42.030(C), which requires project activities to stop if recorded or unrecorded archaeological resources are encountered during construction and an archaeological investigation permit has not been issued. To comply with the consultation requirements of Section 106, the County sent letters to culturally-affiliated Native American tribes with interest in the APE and vicinity. On February 1, 2022, the</p>

		<p>Federated Indians of Graton Rancheria (Graton) responded that they were interested in consulting on the proposed project. On March 16, 2022, County representatives and Graton tribal members held a virtual meeting to discuss the proposed project and any potential impacts. Despite the low sensitivity for intact pre-contact cultural materials to be in the APE, the results of consultation indicate that there is the potential that the fill layer may contain redeposited cultural materials. Graton indicated during consultation that the project site remains sensitive for cultural materials to potentially be in the artificial fill layer. Therefore, the tribe has requested archaeological and tribal monitoring during ground disturbing activities associated with the proposed project, including pavement removal and minor landscaping. The project would implement cultural resources monitoring. Despite the low potential for encountering cultural materials and/or human remains, the possibility of encountering these materials cannot be entirely discounted when an archaeologist and tribal monitor are not present. Therefore, the proposed project should also implement inadvertent discovery of cultural materials and human remains measures. These measures, as well as the cultural resources monitoring measure, are included in the project's mitigation plan. Regarding historic resources, the property was constructed in 1969 as a skilled nursing facility and meets the historic age criteria. In support of Section 106 consultation, it has been evaluated and recommended not eligible for listing in the National Register of Historic Places. No other historic-age properties are within the APE. The County sent a letter to the</p>
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		<p>SHPO on March 17, 2022. On April 11, 2022, the SHPO provided concurrence with the finding of No Historic Properties Affected. Therefore, the project is in compliance with Section 106.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The acceptable exterior noise level set forth by HUD regulations for new construction of housing is 65 DNL or less. DNL is a 24-hour average noise level with a 10 decibel (dBA) penalty for noise occurring during the nighttime hours, defined as 10 p.m. to 7 a.m. The regulations consider the range between 65 dBA DNL and 75 dBA DNL to be normally unacceptable, as long as appropriate sound attenuation measures are provided. A DNL of greater than 75 dBA is considered unacceptable. A Noise Assessment was conducted. ESA modeled noise levels at the project site using the HUD DNL Calculator, which requires assessing noise impacts from roadways up to 1,000 feet away and railways up to 3,000 feet away that could potentially affect noise at the project site. The arterial roadway within 1,000 feet of the project site included in the analysis is Bon Air Road. Existing traffic volumes for this roadway were obtained from the Transportation Authority of Marin. Average daily traffic volumes were used in the HUD DNL Calculator to estimate the ambient noise level at the project site from the roadway source. There are no railways located within 3,000 feet of the project site. Only one airport is located within the preliminary 15-mile screening distance from the project site. San Rafael Airport is located approximately 4.8 miles to the north. However, the project site is located several miles outside of the 55 dBA and 60 dBA Community Noise Equivalent Level (CNEL) airport noise contours</p>

		<p>based on figures contained in the San Rafael General; Plan. Consequently, the contribution of airport noise from San Rafael Airport would not materially contribute to the noise environment at the project site and was not included in the HUD DNL Calculator assessment. The DNL exterior noise from arterial roadway sources was calculated to be 54 dBA DNL at the project building on South Eliseo Road. This would fall within HUD's "acceptable" range, which is less than 65 dBA DNL. Since the project site would not be exposed to noise levels exceeding 65 dBA DNL, attenuation measures beyond State and local law would not be required to ensure interior noise standards are met. Title 24 of the California Code of Regulations establishes uniform noise insulation standards for multi-family residential projects. Multi-family residences must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 dBA. Construction Noise - The Larkspur Municipal Code Section 9.54.060 exempts noise associated with construction, repair, remodeling, demolition, or paving of any real property, including noise from vehicles and equipment associated with these activities, provided they are limited to between the hours of 7:00 am and 6:00 pm Monday through Friday, and between the hours of 9:00 am and 5:00 pm on Saturday. Construction activities associated with the proposed project would occur within the allowed hours specified in the Larkspur Municipal Code. Therefore, project-related construction activities would comply with the Larkspur Municipal Code and construction noise impacts would not be adverse. The project is in compliance with HUD's Noise regulation.</p>
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<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project site is not served by a U.S. EPA designated sole-source aquifer, is not located within a sole source aquifer watershed, and would not affect a sole-source aquifer. The project site would be entirely served by the existing municipal water supply, which is the current site condition. Therefore, the project is in compliance with Sole Source Aquifer requirements.</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project site is located on a parcel immediately north of Corte Madera Creek, a tidal wetland that is located approximately 20 feet from the rear of the existing building. Project construction would involve an interior remodel, landscaping, and resurfacing the existing parking lot. Two trees would be removed; one is a eucalyptus tree with a diameter of 20 inches located adjacent to the parking lot in front of the building along South Eliseo Drive; and the other is in ornamental pear tree with a diameter of 6 inches located in a courtyard surrounded by the building. Neither tree meets the definition of a heritage tree pursuant to Larkspur Municipal Code Section 12.16.010, which states a tree must have a trunk with a circumference of 50 inches or more. Therefore, all construction and tree removal would occur in developed areas away from Corte Madera Creek and the project is not expected to affect wetland or riparian areas. The project is in compliance with Executive Order 11990.</p>
<p>Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The nearest river listed in the National Wild and Scenic River System is a 23-mile segment of the American River, which is located 72 miles northeast of the project site. The nearest river</p>

		classified as a potential candidate for inclusion in the National Wild and Scenic River System is Olema Creek, located approximately 10.5 miles west of the project site. Due to the distance between the project site and these rivers, the proposed project would not affect a wild and scenic river. Implementation of the project would not conflict with the provisions of the Wild and Scenic Rivers Act, and the project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The project is in compliance with Executive Order 12898.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project site has a Larkspur General Plan designation of COM-ADMIN (Commercial: Administration and Professional). The site is zoned AP (Administrative Professional), and has a 25-foot height limit. The proposed use, as a residential care facility, is	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>conditionally permitted in the AP zoning district. However, as a Project Homekey project, the proposed project is exempt from local land use approvals and "shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and any applicable coastal plan, local or otherwise, and allowed as a permitted use, within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or any other discretionary reviews or approvals." The proposed project would convert a former skilled nursing facility to new use as housing facility for currently homeless individuals and those at risk of homelessness. The project does not propose to change the zoning designation of the site. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. Therefore, the proposed project would not conflict with applicable plans, land use designations, zoning, scale, and urban design. Source Document(s): 23</p>	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Seismic Ground Shaking The project site is located in the Coast Ranges Geomorphic Province of California, which extends along the California	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>coast south to the Transverse Ranges and north to the Oregon border. The province is characterized by northwest-southeast trending mountains and faults sub-parallel to the San Andreas Fault Zone. The region comprises sedimentary, igneous, and metamorphic rocks of the Jurassic-Cretaceous age (190 to 65 million years old). In Marin County, a variety of sedimentary and volcanic rocks of Tertiary (1.8 to 65 million years old) and Quaternary (less than 1.8 million years old) overlie the basement rocks of the Franciscan Assemblage. The project site is underlain by artificial fill over Bay Mud, and lies south of a geologic contact with colluvial soils. Fill is typically composed of variable amounts of soil, rock, garbage, and other debris. The project site is located in a seismically active region. The nearest "active" fault, which is defined as one that has shown displacement within the last 11,000 years, is approximately 7.6 miles west of the project site. The project site will likely experience moderate to strong ground shaking from future earthquakes in the region. However, compliance with the 2019 California Building Code would reduce the potential for adverse impacts due to seismic ground shaking. Erosion The project site is paved and relatively flat, and the project</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>would renovate an existing building. Because the project would not involve ground disturbance, it would not exacerbate the potential for erosion at the project site. Stormwater The project site is paved and relatively flat. While the project would not involve ground disturbance, minor alterations to the roof and gutters would be made to the existing building, landscaping would occur, and the parking lot would be resurfaced; however this would not change the area of impermeable area. Therefore, the overall volume of stormwater runoff from the project site would be the same. The project's stormwater conveyance system (new gutters, downspouts, and potentially a new roof) would discharge into the same stormwater conveyance system as is currently on the project site, and the project would not result in adverse changes related to stormwater. Source Document(s): 24</p>	
<p>Hazards and Nuisances including Site Safety and Site-Generated Noise</p>	<p>2</p>	<p>Hazardous Materials As described above in "Contamination and Toxic Substances," historical records and potential hazards for the project site and immediate vicinity were reviewed. No hazardous materials issues were identified and thus construction is not anticipated to disturb contaminated soils or groundwater. Noise</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		Construction would be temporary and construction noise would be mitigated by compliance with the Larkspur Municipal Code. Source Document(s): 9, 10, 16, 17	
Energy Consumption/Energy Efficiency	2	The project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulations. Other than natural gas and coal fuel used to generate the electricity for the project, the project would not have a substantial effect on the use, extraction, or depletion of a natural resource.	
SOCIOECONOMIC			
Employment and Income Patterns	2	Construction on the project site would provide temporary full-time construction jobs, and full- and part-time employees for operations and would be anticipated to be filled by local workers. The existing building is vacant; therefore, the project would not displace existing employees. Therefore, the project would not be anticipated to result in adverse effects to employment and income patterns within the project area.	
Demographic Character Changes / Displacement	2	Demographics The proposed project would not result in physical barriers or reduced access that would isolate a particular neighborhood or population group. Construction would result in temporary construction job growth at the project site, and operation would result in permanent jobs. This increase in employment is	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>anticipated to be accommodated by the existing employment pool. As the proposed project is consistent with the planned use of the site, no adverse demographic changes are anticipated. Displacement The existing building is vacant and no displacement of housing or jobs would occur with implementation of the proposed project.</p>	
COMMUNITY FACILITIES AND SERVICES			
<p>Educational and Cultural Facilities (Access and Capacity)</p>	<p>2</p>	<p>The project would serve existing residents of Marin County experiencing homelessness. The project is not intended to provide family residential services and would likely only serve single people or couples. Therefore, the project would not house school-aged children or otherwise increase the demand for education facilities. The nearest museum is the San Anselmo Historical Museum approximately 3 miles northwest of the project site. The project is an infill project that is consistent with general plan and zoning. The addition of new residents associated with the 44 efficiency units would not generate substantial demand for cultural facilities such as art galleries, libraries, dance facilities, museums, theaters, community centers, or other facilities. The project's 44 efficiency units would not exceed the capacity of Marin</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		County's existing cultural facilities.	
Commercial Facilities (Access and Proximity)	2	The project site is located in close proximity to numerous neighborhood-serving commercial and retail uses, including personal services, restaurants, houseware and apparel shops, and health and fitness clubs. Given the project's location with an established community, there would be adequate and convenient access to essential items such as food, medicine, banks, and other convenience shopping services that would meet the needs of the project occupants.	
Health Care / Social Services (Access and Capacity)	2	The project site is less than 0.2 mile south of MarinHealth Medical Center (formerly Marin General Hospital), and several other medical, dental, and social services are easily accessible from the project site. Health care and social services are within a convenient and reasonable distance to residents of the project, and are accessible via public transportation, personal vehicle, rideshare, or on foot. The project occupants would have adequate access to hospitals, emergency facilities, and social services.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Marin Sanitary Service provides residential and commercial solid waste collection, recycling, and disposal services for the City of Larkspur. Marin Resource Recovery Center, located in San Rafael and operated by the	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Marin Sanitary Service, is the only transfer station in Marin County. Marin Resource Recovery Center discards of solid waste at the Redwood Landfill, which is operated by Waste Management and is in unincorporated Marin County near the City of Novato. Redwood Landfill is the only active landfill in Marin County. Marin Resource Recovery Center also receives most construction and demolition debris in Marin County. Solid waste from the construction and operation of the project would be transferred to the Marin Resource Recovery Center and ultimately to the Redwood Landfill for disposal. The Redwood Landfill has a remaining capacity of 4,868,000 cubic yards and isn't anticipated to reach capacity until 2035. The City of Larkspur is a member of the Marin County Hazardous and Solid Waste Joint Powers Authority, which sponsors a program called Zero Waste Marin. This program aims to divert 80 percent of materials going to a landfill by 2012, and 94 percent by 2025. As of 2019, Marin County only diverted 67 percent of its solid waste from landfills. The project would comply with local policies aimed at reducing waste, which would avoid adverse impacts related to solid waste. One such policy includes City of Larkspur Ordinance Number 985, which</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>complies with State of California Assembly Bill 939 and Senate Bill 1016 and requires the City of Larkspur to divert 80 percent of materials going to a landfill by 2012, and 94 percent by 2025. Other policies related to solid waste include Natural Environment & Resources Policy 5.3 and 5.4, which promote recycling, composting, and waste reduction Strategies; and Health & Safety Policies 2.4 and 10.1, Natural Environment & Resources Policy 4.3, and Land Use Policy 11.5, which are related to the City's Climate Action Plan and call for reducing the amount of solid waste produced in Larkspur. Although the project could incrementally increase total waste generation from the City by increasing the number of residents at the project site, the increasing rate of diversion through recycling and other methods would result in a decreasing share of total waste that requires disposal in the landfill. Therefore, the Redwood Landfill is expected to be able to provide service to the City, including the proposed project, without the need for new expansion beyond that already planned, until the year 2035. Source Document(s): 25, 26, 27</p>	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The project site is within an urban area that is served by storage and treatment facilities operated by the Ross Valley Sanitation District.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Wastewater generated at the project site is collected by the Ross Valley Sanitation District, which provides wastewater collection and transfer service in the City of Larkspur. The Ross Valley Sanitation District operates and maintains approximately 200 miles of collection sewer lines and 19 pumping stations which collect, pump, and transport approximately four million gallons of wastewater per day to the Central Marin Sanitation Agency for treatment. During dry weather, the Central Marin Sanitation Agency has a dry weather capacity of 10 million gallons per day (mgd). During wet weather, the plant processes up to 30 mgd of combined wastewater. The Central Marin Sanitation Agency currently operates under National Pollutant Discharge Elimination System Permits. The Central Marin Sanitation Agency is currently operating under the 2018 NPDES Permit No. CA0038628 (Order No. R2-2018-0003) issued and enforced by the San Francisco Bay Regional Water Quality Control Board, which monitors discharge prohibitions, dry-weather effluent limitations, wet-weather effluent performance criteria, receiving water limitations, sludge management practices, and monitoring and reporting requirements. The project would incrementally</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>increase demand for and use of wastewater and sanitary sewer services. As stated in a 2017 review of central Marin County's public wastewater services, central Marin County generates peak-day demands of approximately 72 percent and 85 percent of the Central Marin Sanitation Agency's wet and dry weather capacity, respectively. Moreover, the study predicts that collection and treatment system capacities are sufficient to accommodate current and projected demands through 2024. The project would house individuals who are currently residing in the county, and as such, the new demand would not increase the population in the Central Marin Sanitation Agency's service area. Because the project would not generate demand that would exceed growth projections in the county, and because the Central Marin Sanitation Agency currently has capacity available to serve the project, the project would not have adverse impacts on wastewater. Source Document(s): 28, 29, 30</p>	
Water Supply (Feasibility and Capacity)	2	<p>Water would be supplied to the project from the Marin Municipal Water District, which supplies potable water to a 147-square-mile area and approximately 190,000 customers, including the City of Larkspur. In 2020, overall water demand in the Marin Municipal Water District service</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>area was 26,703 acre feet for a service area population of 191,269, or 125 gallons per capita per day. The district estimates total demand would increase to 38,207 acre feet in 2045 with a 2045 service area population of 211,961, but due to water conservation efforts, the per capita water demand would be reduced to 75 gallons per capita per day. Using this ratio, the project's 44 residential units would demand approximately 3,300 gallons of water per day in 2045, or approximately 0.02 percent of water demand for the district as a whole in 2045, constituting a negligible increase in anticipated water demand. The Marin Municipal Water District uses population growth projections provided by the Association of Bay Area Governments to develop the water demand projections contained in the 2020 Urban Water Management Plan. The project would be encompassed within planned growth in the district's service area; therefore, it is accounted for in the water demand projections contained in the urban water management plan. Because the project would comprise a small fraction of future water demand that has been accounted for in the district's urban water management plan, the district's current water supply portfolio is sufficient to meet 2045 demand</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>under most scenarios. However, the district did identify that emergency supplies combined with mandatory conservation and rationing would be needed to manage water supply if a six-year severe drought were to occur. Source Document(s): 31, 32</p>	
<p>Public Safety - Police, Fire and Emergency Medical</p>	<p>2</p>	<p>The project site is served by the Central Marin Police Authority, located at 250 Doherty Drive in Larkspur, approximately 0.5 mile away from the project site. The Central Marin Fire Department provides fire suppression services and emergency medical services and transport. The nearest fire stations are under one mile away: Fire Station 15 at 420 Magnolia Avenue and Fire Station 16 at 15 Barry Way. Other emergency medical transportation to the MarinHealth Medical Center could be provided by a number of private ambulance providers and the hospital itself in addition to the Central Marin Fire Department. Implementation of the project could increase the demand for fire protection, emergency medical and police protection services. However, the increase would be incremental, and would not be substantial given the overall demand for such services on a district-wide basis. Fire protection, emergency medical, and police protection resources are regularly assessed in order to maintain acceptable</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		service ratios. Source Document(s): 33, 34, 35	
Parks, Open Space and Recreation (Access and Capacity)	2	The nearest public open space to the project site is Hamilton Park, located directly to the east. Hamilton Park offers direct water views and contains a walking path, benches, a lawn, pet waste station, and picnic tables. Other parks within one mile of the project site include the 27-acre Hal Brown Park at Creekside and 22-acre Piper Park. The project would increase the demand for recreational services and activities; however the numerous parks, open space, and recreation facilities nearby can accommodate this demand. Source Document(s): 36	
Transportation and Accessibility (Access and Capacity)	2	Site Access/Safety/Balance The proposed project would consist entirely of interior renovation of the existing building and would not require excavation or demolition of external building components. The two existing driveways providing vehicular access to the project site, one-way in and one-way out, would remain with project implementation, as would the existing 34 parking spaces in front of the building. Furthermore, the existing pedestrian and bicycle facilities, and transit service on South Eliseo Drive would not be obstructed or otherwise affected by any feature of the proposed project. Therefore, the proposed project would not	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>result in significant transportation effects related to site access, safety, or multi-modal travel. Level of Service With respect to traffic operations, which is often measured using level of service (LOS), Chapter 18.14 of the Larkspur Municipal Code normally requires a circulation assessment permit be issued prior to issuance of a building permit. The circulation assessment permit must be supported by a traffic impact study including LOS analysis for "applicable projects," as defined in Municipal Code Section 18.14.050. However, because Municipal Code Section 18.14.090(C) requires that the Larkspur Planning Commission "approve, approve with conditions or modifications, or deny" an application for a circulation assessment permit, this permit is considered a discretionary approval from which the project, as a Project Homekey project, is exempt. Accordingly, no analysis of LOS is required. For informational purposes, the project's daily and peak-hour trip generation were calculated, using the Institute of Transportation Engineers (ITE) Trip Generation Manual; because the ITE manual does not contain specific trip generation data for the proposed use, the trip generation for a use with similar operational characteristics -</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>assisted living facility (ITE Land Use Code 254) - was used as a proxy. Using the proposed number of employees (17) and the assisted living facility trip generation rates, the project would generate approximately 72 daily vehicle trips, seven a.m. peak hour vehicle trips, and eight p.m. peak hour vehicle trips. These small numbers of vehicle trips would not be noticeable in comparison to existing traffic volumes and the daily variation in these volumes and, therefore, the proposed project would not result in perceptible transportation effects related to traffic operations. Vehicle Miles Traveled The proposed project would meet the Governor's Office of Planning and Research's (OPR's) Technical Advisory for Evaluating Transportation Impacts in CEQA (Technical Advisory) Screening Threshold for Small Projects, which states that projects that generate less than 110 daily vehicle trips would result in a less-than-significant VMT impact. As noted above, the proposed project would generate approximately 72 daily vehicle trips. Therefore, the proposed project would not result in significant transportation effects related to VMT. Source Document(s): 37, 38, 39</p>	
NATURAL FEATURES			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Unique Natural Features /Water Resources	2	The 1.3-acre project site is situated along the north bank of Corte Madera Creek. Implementation of the project would involve rehabilitation of an existing structure and would not affect the Corte Madera Creek. The project site is underlain by artificial fill over marshland. This geologic context has a low potential to yield paleontological resources. Source Document(s): refer to Cultural Resources Survey Report	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	3	The project site includes an existing single-story building, which formerly served as a 43-unit skilled nursing facility, and a paved parking lot with 34 spaces. The site consists entirely of developed and disturbed habitat, except for landscape vegetation and trees that have been planted as part of the site's development, including a row of Monterey pine (<i>Pinus radiata</i>), and non-native eucalyptus (<i>Eucalyptus</i> sp.) and magnolias (<i>Magnolia</i> sp.). The lack of natural/native vegetation at the project site precludes the presence of any sensitive vegetative communities and limits the potential presence of wildlife, which likely includes only transitory visits by common animals that are highly adapted to urban areas, such as raccoon (<i>Procyon lotor</i>) and Virginia opossum (<i>Didelphis virginiana</i>). Birds protected by the federal Migratory Bird Treaty Act	Avoidance of Nesting Birds: Removal of trees could directly affect birds protected by the MBTA if birds are nesting in the trees at the time they are removed. To avoid and minimize effects to MBTA-protected birds, the project sponsor would remove the trees between September 1 and February 14 (inclusive), if feasible, to avoid the nesting bird season. If trees are removed between February 15 and August 31 (inclusive), the project sponsor would hire a professional bird biologist to conduct a survey for nesting birds no more than 7 days prior to removal

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>(MBTA) could nest in trees and landscape vegetation on site. Because construction would be limited to renovation of the interior of the building, landscaping, and resurfacing the existing parking lot, construction activities are not expected to affect nesting birds. However, two trees would be removed - an ornamental pear tree in a courtyard surrounded by the building and a eucalyptus tree at the entrance to the parking lot on South Eliseo Drive. Removal of these trees could directly affect birds protected by the MBTA if birds are nesting in the trees at the time they are removed. To avoid and minimize effects to MBTA-protected birds, the project sponsor should avoid and minimize effects to MBTA-protected birds. With implementation of this avoidance and implementation measure, no effects to MBTA-protected birds or any other wildlife are anticipated from this project. Source Document(s): 11, 12</p>	<p>of the trees. If no active nests are identified during the survey period, tree removal can proceed with no restrictions. If active bird nests are present, an adequate no-disturbance buffer shall be established around the nest tree and tree removal delayed until the bird biologist has confirmed that any young birds have fledged and have left the immediate area.</p>
Other Factors	2	<p>Greenhouse Gas Emissions The BAAQMD has established a numeric GHG screening threshold of significance of 1,100 MTCO₂e for operational phases of a land use project. This threshold was developed based on the year 2020 GHG reduction goals of the Consistent with the latest BAAQMD guidance to date (2017). However, in order to</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>consider further reduction required by the 2017 Climate Change Scoping Plan Update of achieving the 2030 GHG target of 40 percent reduction in GHG emissions relative to 1990 levels, this threshold may be adjusted to 660 MTCO_{2e}. GHG emissions from operations were compared to this adjusted value of BAAQMD's screening threshold of significance. CalEEMod (version 2020.4.0) was used to estimate operational GHG emissions resulting from the project to determine if it would exceed the BAAQMD threshold of 1,100 MTCO_{2e} per year. Model results indicate that total GHG emissions from construction would be approximately 76 MTCO_{2e}. The estimated annual operational emissions from proposed project operations would be approximately 132 MTCO_{2e} per year. GHG emissions resulting from both project construction and operation would be below the year 2020 threshold of 1,100 MTCO_{2e} per year as well as below the adjusted 2030 screening threshold of 660 MTCO_{2e}. Therefore, GHG emissions of the proposed project would be less than significant. Additionally, these emissions would occur in the jurisdiction of the City of Larkspur. Larkspur's updated Climate Action Plan 2030 was adopted in July 2021. This</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>updated Climate Action Plan identifies the City's actions to pursue cleaner energy, energy conservation, alternative transportation, and solid waste policies. It also contains a measure to prohibit the use of natural gas end uses in new residential buildings in the City's green building ordinance no later than the adoption of the 2022 California Building Standards Code update. Therefore, GHG emissions would be further reduced below those estimated above. The proposed project would not substantially impact climate change by way of generated greenhouse gas emissions. Source Document(s): 3, 4, 5, and Attachment 2</p>	

Supporting documentation

- [17 2022 0201 DNL Calculator - HUD Exchange\(1\).pdf](#)
- [16 2017 0428 San Rafael GP-2020-Noise-Element Reprint.pdf](#)
- [05 2022 0126 BAAQMD Bay Area Air Quality Standards and Attainment Status\(1\).pdf](#)
- [04 2022 0126 EPA De Minimis Tables\(1\).pdf](#)
- [03 2017 0500 BAAQMD CEQA AQ Guidelines May 2017\(1\).pdf](#)
- [39 2022 0215 MarinTransit 228Schedule.pdf](#)
- [38 2018 1200 OPR TechnicalAdvisory EvaluatingTransportationImpactsinCEQA.pdf](#)
- [37 2017 0000 ITE 10th Edition Land Use Code 254.pdf](#)
- [36 2015 0100 CityofLarkspur LarkspurMiniParksActionPlan.pdf](#)
- [35 2022 0105 MarinCountyEmergencyMedicalServicesAgency EMSSystemInformation.pdf](#)
- [34 2022 0105 CentralMarinPoliceAuthority PoliceHeadquartersFacility.pdf](#)
- [33 2022 0215 CentralMarinFireDepartment home.pdf](#)
- [32 2021 0600 MarinMunicipalWaterDistrict 2020UrbanWaterManagementPlan.pdf](#)
- [31 2017 0300 MarinMunicipalWaterDistrict WaterResourcesPlan2040.pdf](#)
- [30 2018 0110 RWQCB NPDESOrder+permit.pdf](#)
- [29 2017 0400 CentralMarinWastewaterServicesStudy.pdf](#)

[28 2022 0104 RossValleySanitaryDistrict_about_us.pdf](#)
[27 2012 0502 CityofLarkspur_Ordinance985_ConstructionandDemolitionDebris.pdf](#)
[26 2021 0707 R3ConsultingGroupInc_Final-Zero-Waste-Plan-Update.pdf](#)
[25 2022 0322 Erfani_Tara_RemainingCapacityRedwoodLandfill.pdf](#)
[25 2022 0104 CalRecycle_SWISFacilitySiteActivityDetails_RedwoodLandfill.pdf](#)
[24 2015 1207 MillerPacificEngineeringGroup_PreliminaryGeotechnicalReport.pdf](#)
[23 2020 1218 CityofLarkspur_2040GeneralPlan.pdf](#)
[12 2022 0106 USFWS_Species_List_Sacramento_FWO\(1\).pdf](#)
[11 2022 0106 CNDDDB_OccurrenceReport_Jan6_2022\(1\).pdf](#)
[10 2021 1230 CADeptofToxicSubstancesControl_EnviroStor_Database\(1\).pdf](#)
[09 2021 1019 ACCEnvironmentalConsultants_PhaseIEnvironmentalSiteAssessmentReport\(1\).pdf](#)
[Attachment 2_AQ and GHG Supporting Info\(1\).pdf](#)

Additional Studies Performed:

1. November 12, 2021, Revised Preliminary Geotechnical Investigation for Due Diligence Evaluation, Proposed Rehabilitation of Existing Building, 1251 S Eliseo Drive, Greenbrae, California, completed by Rockridge Geotechnical. 2. October 19, 2021, Phase I Environmental Site Assessment Report: 1251 South Eliseo Drive, Larkspur, California 94904, completed by ACC Environmental Consultants. 3. October 22, 2021, Elevation Certificate for 1251 S. Eliseo Dr., completed by Meridian Surveying Engineering, Inc.

[1251 S Eliseo Dr GeoReport_20211112_rev1.pdf](#)
[21091 714 S ELISEO Episcopal FIS Profile product.pdf](#)
[PhaseIESA_SEliseo.pdf](#)

Field Inspection [Optional]: Date and completed

by:

Vanessa Armenta

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[IMG7840.JPG](#)

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

Julianne Polanco, State Historic Preservation Officer, Department of Parks and Recreation, Office of Historic Preservation Julia Barnes, Supervising Hazardous Materials Specialist, Marin County Tara Erfani, Senior Environmental Health Specialist, Marin County Buffy McQuillen, Graton Rancheria Hector Garcia, Graton Rancheria

List of Permits Obtained:

Building permits issued by the City of Larkspur are anticipated to be obtained in summer 2022.

Public Outreach [24 CFR 58.43]:

* 9/21/2021: County Press Release * 9/26/2021: An article about the project was published in the Marin Independent Journal * 10/12/2021: Marin County Board of Supervisors Hearing on the proposed project * 10/13/2021: An article about the project was published in the Marin Independent Journal * 10/21/2021: 1st public meeting * 11/4/2021: 2nd public meeting (over 1,600 notices were sent to residents in the neighborhood) * 11/6/2021: An article about the project was published in the Marin Independent Journal * 11/13/2021: An article about the project was published in the Marin Independent Journal * 11/18/2021: A community meeting was held for parents & staff of Kentfield School District 12/1/2021: 1st community advisory group meeting * 03/17/2022: Floodplain notice initially published * 03/28/2022: Floodplain notice republished * 12/14/2021: 1st communications workgroup meeting of the community advisory group * 1/18/2022: 3rd public meeting * 2/8/2022: Larkspur City Council meeting

[MailingList.pdf](#)

Cumulative Impact Analysis [24 CFR 58.32]:

A cumulative impact is an impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. One project located within 0.25-mile of the project site, the MarinHealth Medical Center Ambulatory Services Building, parking structure, and pedestrian bridge, would contribute to the reasonably foreseeable cumulative environment. This project would construct a new five-story, 100,000-square-foot Ambulatory Services Building, a new six-story, 20,000-square-foot parking structure, and a pedestrian bridge that would connect the two structures. The analysis conducted for this Environmental Assessment has determined that, with mitigation, the project would not result in adverse impacts. Due to the distance between the proposed project and the MarinHealth Medical Center Ambulatory Services Building, the proposed project would not combine with ambulatory services building to result in adverse cumulative impacts. Consequently, the proposed project would not contribute significantly to an identified cumulative impact.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Alternative location and site configurations for the project were contemplated. However, the proposed project best meets the purpose and need to provide permanent supportive housing within the timeframe allowed under Project Homekey. Alternative Location - Locate the Project Outside of the Floodplain No other sites were available in which the property owner was willing to sell their property, or which could be constructed or rehabilitated within the timeframe required to be eligible for Project Homekey funds. Therefore, no alternative sites within the County of Marin could provide these benefits, including sites outside of the floodplain. Based on the level of funding requested, obtaining a new property or building a new development on an alternative site would not be financially feasible. Alternate Project Site Configuration Alternative configurations considered include changing the proposed site layout to avoid touching the 100-year floodplain. While alternative building configurations may technically be feasible and would avoid being within the 100-year floodplain, construction of a new building within a new footprint on the project site is not feasible within the required timeframe allowed under Project Homekey.

No Action Alternative [24 CFR 58.40(e)]

The no action alternative would mean that the project site would likely remain as a vacant medical building and would not be developed with new permanent supportive housing.

Summary of Findings and Conclusions:

With adherence to applicable laws, authorities, and other enforceable measures, and implementation of specified mitigation measures, all potentially adverse effects of the proposed project would be avoided or mitigated. No impacts would be potentially significant to the extent that an Environmental Impact Statement would be required. With mitigation, the project would result in only less-than-significant impacts to the environment, with beneficial socioeconomic impacts.

Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Flood Insurance	For loans, loan insurance or guarantees, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the National Flood Insurance Program, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less.	N/A	See attached mitigation plan.	
Floodplain Management	The project would include storm shutters for windows and doors. In addition, a mitigation measure requiring the project sponsor to obtain flood insurance is included in the Environmental Review Record.	N/A	See attached mitigation plan.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	Avoidance of Nesting Birds: Removal of trees could directly affect birds protected by the MBTA if birds are nesting in the trees at the time they are removed. To avoid and minimize effects to MBTA-protected birds, the project sponsor would remove the trees between September 1 and February 14 (inclusive), if feasible, to avoid the nesting bird season. If trees are removed between February 15 and August 31 (inclusive), the	N/A		

	<p>project sponsor would hire a professional bird biologist to conduct a survey for nesting birds no more than 7 days prior to removal of the trees. If no active nests are identified during the survey period, tree removal can proceed with no restrictions. If active bird nests are present, an adequate no-disturbance buffer shall be established around the nest tree and tree removal delayed until the bird biologist has confirmed that any young birds have fledged and have left the immediate area.</p>			
<p>Flood Insurance</p>	<p>For loans, loan insurance or guarantees, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the National Flood Insurance Program, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less.</p>	<p>N/A</p>	<p>Episcopal Community Services (ECS), the project sponsor, is responsible for implementing this mitigation measure. ECS shall provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance to the County of</p>	

			Marin prior to the start of construction.	
Historic Preservation	<p>Cultural Resources Monitoring: Prior to authorization to proceed, a Secretary of the Interior-qualified archaeologist shall prepare a cultural resources monitoring plan. The plan shall be reviewed by the culturally-affiliated Native American tribe(s) and the County. The plan will include the following components: *</p> <ul style="list-style-type: none"> * Training program for all construction and field workers involved in site disturbance. * Specifically, where monitoring will be completed and under what circumstances based on ground-disturbing activity. * Person(s) responsible for conducting monitoring activities, including a culturally affiliated Native American tribal monitor. * Protocol for notifications in case of encountering cultural resources, as well as methods of dealing with the encountered resources (e.g., collection, identification). * Methods to ensure security of cultural resources sites. * Protocol for notifying local authorities (i.e. Sheriff, Police) should site looting and other illegal activities occur during construction. During the course of the monitoring, the archaeologist and tribal monitor may adjust the frequency--from continuous to intermittent--of the monitoring based on the conditions and professional judgment regarding the potential to impact resources. 	N/A	Episcopal Community Services (ECS), the project sponsor, is responsible for implementing this mitigation measure. ECS shall demonstrate compliance with this measure to the County of Marin prior to the start of construction.	

<p>Historic Preservation</p>	<p>Inadvertent Discovery of Cultural Materials: If pre-contact or historic-era cultural materials are encountered, all construction activities within 100 feet will halt. The County of Marin will be notified. Pre-contact materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include deposits of metal, glass, and/or ceramic refuse. A Secretary of the Interior-qualified archaeologist will inspect the findings within 24 hours of discovery. If it is determined that the project could damage a significant resource, the project applicant shall re-design the Project to avoid any adverse effects. If avoidance is not feasible, a qualified archaeologist shall prepare and implement a detailed Archaeological Resources Management Plan in consultation with the State Historic Preservation Officer and, for pre-contact resources, the appropriate Native American representative(s).</p>	<p>N/A</p>	<p>Episcopal Community Services (ECS), the project sponsor, is responsible for implementing this mitigation measure. ECS shall comply with this measure during construction.</p>	
<p>Historic Preservation</p>	<p>Inadvertent Discovery of Human Remains: In the event of discovery of any human remains during project activities, such</p>	<p>N/A</p>	<p>Episcopal Community Services (ECS), the</p>	

	<p>activities within 100 feet of the find shall cease until the Marin County Coroner has been contacted to determine that no investigation of the cause of death is required. The Native American Heritage Commission will be contacted within 24 hours if it is determined that the remains are Native American. The Commission will then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the County of Marin for the appropriate means of treating the human remains and any grave goods.</p>		<p>project sponsor, is responsible for implementing this mitigation measure. ECS shall comply with this measure during construction.</p>	
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Project Mitigation Plan

See attached project mitigation plan

[1251 S Eliseo MMRP.docx](#)

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD’s policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ **No**

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The San Rafael Airport is located approximately 5 miles to the north. This airport does not have an adopted airport land use compatibility plan. Moreover, the proposed project would not be affected by the San Rafael Airport due to the substantial distance between the airport and the project site. Gness Field is a publicly owned airport more than 13 miles north of the project site. The project site is well outside the boundaries of the Gness Field safety zones as depicted in Figure 3.1, Safety Zones, Gness Field (see p. 3.13 in source document 1). There are no active military airfields in Marin County or the nearby vicinity; therefore, no military airfield Airport Protection Zone or Clear Zone would affect the proposed project.

Supporting documentation

- [01_1991_0610_Cortright+Seibold_AirportLandUsePlan_MarinCountyAirport_GnessField.pdf](#)
- [2070 - Airport Hazards Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, the project site is not within a Coastal Barrier Resource System (CBRS) Unit, or CBRS buffer zones, as defined under the Coastal Barrier Resources Act of 1982 (PL 97-348), as amended by the Coastal Barrier Improvement Act of 1990 (PL 101-591). This project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[02_2021_1229_USFWS_CoastalBarrierResourcesSystem_Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

Yes

2. Upload a FEMA/FIRM map showing the site here:

[1251 S Eliseo Dr_FEMA FIRM Map.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

No

Yes

3. Is the community participating in the National Flood Insurance Program or has less than one year passed since FEMA notification of Special Flood Hazards?

Yes, the community is participating in the National Flood Insurance Program.

Based on the response, the review is in compliance with this section. Flood insurance under the National Flood Insurance Program must be

obtained and maintained for the economic life of the project, in the amount of the total project cost or the maximum coverage limit, whichever is less.

Document and upload a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance below.

Yes, less than one year has passed since FEMA notification of Special Flood Hazards.

No. The community is not participating, or its participation has been suspended.

Screen Summary

Compliance Determination

The Federal Emergency Management Agency (FEMA) is responsible for delineating areas that are expected to be subject to flooding during a 100-year flood event. A 100-year flood event is defined as the area that is expected to be inundated by flood flows during a rainfall event that would have an annual probability of occurrence of one percent. FEMA refers to the portion of the floodplain or coastal area that is at risk from floods of this magnitude as Special Flood Hazard Areas. FEMA creates and maintains Flood Insurance Rate Maps (FIRMs) which identify areas located within a 100-year floodplain boundary area. Based on FEMA flood hazard mapping, the project site is in Zone X - 0.2 Percent Annual Chance Flood Hazard, which is the 500-year floodplain; however, a small portion of the property is located in Zone AE - Areas subject to inundation by the 1-percent-annual-chance flood event, which is the 100-year floodplain. The Zone AE designation is a Special Flood Hazard Area with low flood risk. Therefore, the structure or insurable property is located in a FEMA-designated Special Flood Hazard Area. Because portions of the project site are within the 100-year floodplain, analysis under the eight-step process pursuant to Executive Order 11988 is required, and the project sponsor would obtain Flood Insurance pursuant to the Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994. The eight-step process is discussed further under "Floodplain Management." The community is participating in the National Flood Insurance Program. For loans, loan insurance or guarantees, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the National Flood Insurance Program, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. With flood insurance the project is in compliance with flood insurance requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes

No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

No, project's county or air quality management district is in attainment status for all criteria pollutants.

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

- ✓ Ozone
- ✓ Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Carbon monoxide	ppm (parts per million)
Ozone	ppb (parts per million)
Particulate Matter, <2.5 microns	µg/m ³ (micrograms per cubic meter of air)

Provide your source used to determine levels here:

De minimis screening levels are established in tons per year instead of concentrations, per 40 CFR 93.153. Project quantities were calculated using CalEEMod - see analysis below.

4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

- ✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Carbon monoxide	ppm (parts per million)
Ozone	ppb (parts per million)
Particulate Matter, <2.5 microns	µg/m ³ (micrograms per cubic meter of air)

Based on the response, the review is in compliance with this section.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

Comparison to Federal General Conformity De Minimis Levels The modeling results indicate that maximum annual emissions from construction would be approximately:

* 0.5 tons per year of nitrogen oxides (NO_x); * 0.05 tons per year of particulate matter (PM₁₀); * 0.03 tons per year of fine particulate matter (PM_{2.5}); and * 0.7 tons per year of carbon monoxide (CO). Based on the San Francisco Bay Area Air Basin's designation status as marginal nonattainment for ozone, moderate nonattainment for PM_{2.5}, and maintenance for CO, federal de minimis levels would be 100 tons per year for each of these pollutants or their precursors (ROG, NO_x, PM_{2.5}, and CO). A conformity determination would be required for each criteria pollutant or precursor exceeding the federal General Conformity de minimis level. Emissions of ROG, NO_x, PM_{2.5}, and CO from construction would be below the federal General Conformity de minimis levels pursuant to the 1990 amendments to the Federal Clean Air Act. Results from CalEEMod indicate that annual emissions from the operation of the project would be approximately: * 0.07 tons per year of NO_x; * 0.07 tons per year of PM₁₀; * 0.02 tons per year of PM_{2.5}; and * 0.6 tons per year of CO. Operational emissions would also be below the federal de minimis level of 100 tons per year for ROG, NO_x, PM_{2.5}, and CO. Therefore, the Proposed Action is exempt from General Conformity regulations. Comparison to Bay Area Air Quality Management District Thresholds The modeling results indicate that the average daily emissions from construction, excluding fugitive dust, would be: * 2.4 pounds per day of ROG (threshold is 54 pounds per day of ROG and NO_x); * 5.0 pounds per day of NO_x (threshold is 54 pounds per day of ROG and NO_x); * 0.3 pound per day of exhaust PM₁₀ (threshold is 54 pounds per day of exhaust PM_{2.5}); and * 0.2 pound per day of exhaust PM_{2.5} (threshold is 82 pounds per day of exhaust PM₁₀). It is important to note that BAAQMD only considers exhaust particulate matter in its thresholds of significance and emphasizes implementation of its basic and enhanced construction mitigation control measures to ensure that fugitive dust impacts are reduced to a less than significant level. Results from CalEEMod indicate that maximum annual and average daily emissions from the operation of the project would be: * 0.17 ton per year / 0.93 pounds per day of ROG (threshold is 10 tons per year / 54 pounds per day of ROG and NO_x (each)); * 0.07 ton per year / 0.38 pounds per day of NO_x (threshold is 10 tons per year / 54 pounds per day of ROG and NO_x (each)); * 0.07 tons per year / 0.38 pounds per day of total PM₁₀ (threshold is 10 tons per year / 54 pounds per day of exhaust PM_{2.5}); and * 0.02 tons per year / 0.11 pounds per day of total PM_{2.5} (Threshold is 15 tons per year / 82 pounds per day of exhaust PM₁₀). Consequently, criteria pollutant emissions from construction and operation of the project would not exceed BAAQMD's thresholds of significance and no mitigation would be required. Given that (1) the project's construction-related exhaust emissions of PM₁₀ (a conservative proxy for diesel particulate matter [DPM]) are substantially below the BAAQMD-published thresholds of significance of 80 pounds per day, (2) the substantial existing proportion of the construction equipment fleet within the Bay Area that have Tier 4 engines, which have advanced emission-control technologies, and (3) the proposed project consists of rehabilitation of an existing building and would involve minimal ground disturbance or diesel-powered

off-road equipment, the project would not result in significant adverse risks to community health from construction activities. The project is in compliance with the Clean Air Act.

Supporting documentation

[Attachment 2 AQ and GHG Supporting Info.pdf](#)

[07_2004_0500_US_EPA_Clean Air Nonroad Diesel Rule_May2004.pdf](#)

[06_2018_0301_ARB_In-Use Off-Road Equipment_2011 Inventory Model.pdf](#)

[05_2022_0126_BAAQMD_Bay Area Air Quality Standards and Attainment Status.pdf](#)

[04_2022_0126_EPA_De Minimis Tables.pdf](#)

[03_2017_0500_BAAQMD_CEQA AQ Guidelines_May 2017.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes

✓ No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

The project site is not within a Coastal Zone Management Area managed by the California Coastal Commission. However, the project site is adjacent to Corte Madera Creek, which is within the Bay Conservation and Development Commission's (BCDC) jurisdiction. However, the project site itself is not within BCDC jurisdiction, as explained below. BCDC exercises authority under Coastal Zone Management Act for activities receiving federal funding, such as the proposed project, and has jurisdiction over the Corte Madera Creek. BCDC's jurisdiction extends to five feet above mean sea level in areas of tidal marsh, which the project site is adjacent to. The project sponsor undertook a site survey in October 2021 to determine the elevation of the project site. The survey determined the lowest adjacent grade to the building footprint is 8.8 feet North American Vertical Datum of 1988 (NAVD88), and the lowest grade within the property is 5.7 feet NAVD88. Therefore, the project site--and the property--are not within BCDC jurisdiction, and no permits from the BCDC are required.

Therefore, the project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Coastal_Zone_05CZB_MarinCounty_att.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Contamination and Toxic Substances

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)

1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the Above

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

No

Yes

Screen Summary

Compliance Determination

Supporting documentation

[10_2021_1230_CADeptofToxicSubstancesControl_EnviroStor_Database.pdf](#)
[09_2021_1019_ACCEnvironmentalConsultants_PhaseIEnvironmentalSiteAssessmentReport.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species or habitats?

- ✓ No, the project will have No Effect due to the nature of the activities involved in the project.

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

Based on the response, the review is in compliance with this section.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

Yes, the activities involved in the project have the potential to affect species and/or habitats.

Screen Summary

Compliance Determination

The project site includes an existing single-story building, which formerly served as a 43-unit skilled nursing facility, and a paved parking lot with 34 spaces; therefore, the site consists entirely of developed and disturbed habitat, except for landscape vegetation and trees that have been planted as part of the site's development. Although the federally endangered salt marsh harvest mouse (*Reithrodontomys*

raviventris) and California Ridgway's rail (*Rallus obsoletus obsoletus*) have been documented in coastal saltmarsh habitat 0.15 mile northwest and 0.3 mile southeast of the project site, there is no suitable coastal saltmarsh or other habitat present at the project site that could support these species, even on a transient basis. No federally designated critical habitats are documented within the project site. No effects on federally listed species or critical habitat are anticipated from the project. Therefore, the project is in compliance with the Endangered Species Act.

Supporting documentation

[12 2022 0106 USFWS Species List Sacramento FWO.pdf](#)

[11 2022 0106 CNDDDB OccurrenceReport Jan6 2022.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

Yes

Based on the response, the review is in compliance with this section.

No

Screen Summary

Compliance Determination

The project does not involve explosive or flammable materials or operations. There is no visual evidence or indication of unobstructed or unshielded above ground storage tanks (fuel oil, gasoline, propane, etc.) at or immediately adjacent to the project site. The nearest above-ground storage tanks (ASTs) are between 0.5 to 1 mile from the project site. These include O Stadium Way, which contains a 5,000 gallon tank and has an acceptable separation distance of 541 feet for people and 106 feet for buildings; Sanitary District Pump Station 15, which contains a 6,000 gallon diesel fuel tank and has an acceptable separation distance of 584 feet for people and 116 feet for buildings; and the Marin Municipal Water District Corporation Yard at 220 Tamal Vista Boulevard, which contains a 15,000 gallon tank and has an acceptable separation distance of 855 feet for people and 176 feet for buildings. Because the project site is between 3,860 and 5,053 feet from these ASTs and is separated by numerous buildings, it is located at an acceptable distance from these ASTs. Thus, no explosive hazard to the project site would occur. Therefore, the project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[Explosive Flammable Materials SupportingInfo.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

✓ No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

The project would rehabilitate an existing building and would not convert undeveloped land.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

The project site is classified by the California Department of Conservation as "Urban and Built-Up Land;" therefore, the project would not affect farmlands regulated under the Farmland Protection Policy Act (7 U.S.C. 4201 et seq, implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended). As such, the project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[14_2018_0400_CADeptOfConservation_MarinCountyImportantFarmland2016.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

55.12(c)(3)

55.12(c)(4)

55.12(c)(5)

55.12(c)(6)

55.12(c)(7)

55.12(c)(8)

55.12(c)(9)

55.12(c)(10)

55.12(c)(11)

None of the above

2. Upload a FEMA/FIRM map showing the site here:

[1251 S Eliseo Dr FEMA FIRM Map.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use **the best available information** to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

Does your project occur in a floodplain?

No

Yes

Select the applicable floodplain using the FEMA map or the best available information:

Floodway

Coastal High Hazard Area (V Zone)

✓ 100-year floodplain (A Zone)

500-year floodplain (B Zone or shaded X Zone)

8-Step Process

Does the 8-Step Process apply? Select one of the following options:

✓ **8-Step Process applies**

Document and upload the completed 8-Step Process below. Be sure to include the early public notice and the final notice.

5-Step Process is applicable per 55.12(a)(1-4). Provide documentation of 5-Step Process.

8-Step Process is inapplicable per 55.12(b)(1-5).

Mitigation

For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

The project would include storm shutters for windows and doors. In addition, a mitigation measure requiring the project sponsor to obtain flood insurance is included in the Environmental Review Record.

Which of the following mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply.

Permeable surfaces

Natural landscape enhancements that maintain or restore natural hydrology

Planting or restoring native plant species

Bioswales

Evapotranspiration

Stormwater capture and reuse

Green or vegetative roofs with drainage provisions

Natural Resources Conservation Service conservation easements or similar easements

Floodproofing of structures

Elevating structures including freeboarding above the required base flood elevations

Other

Screen Summary

Compliance Determination

As discussed under Flood Insurance, based on FEMA flood mapping, the project site is in Zone X - 0.2 Percent Annual Chance Flood Hazard, which is the 500-year floodplain, and a small portion of the property is located in Zone AE - Areas subject to inundation by the 1-percent-annual-chance flood event, which is the 100-year floodplain. The Zone AE designation is a Special Flood Hazard Area with low flood risk. Since a portion of the project site is within the 100-year floodplain, the eight-step decision-making process was completed for the proposed project. As outlined in the decision-making process, a public notice describing the project and its location within a floodplain was published in the Marin County Independent Journal, a newspaper of general circulation in the project area, on March 17, 2022 and March 28, 2022. The second notice requested that comments be received by April 12, 2022, allowing the required 15 calendar days for public comment. Forty-three comments were received in response to the public notice. Commenters noted the site is subject to occasional flooding, that alternative sites are available, and that the project could impact wildlife, water quality, and public safety (potential to increase crime). As outlined in the decision-making process, alternatives to using HUD funds for a project located within the 100-year floodplain were evaluated. The following alternatives were considered:

locate the project outside of the floodplain; alternative project site configuration, and a no action alternative that serves the same purpose. Based on the analysis in this EA, it is determined that the proposed project would not have impacts to natural or aquatic resources as the proposed improvements are located in previously disturbed areas. The project site and surrounding area are characterized by urban development and thus lack natural floodplain values and functions. Furthermore, the proposed project would not significantly increase the risk of loss of life and property because the primary and emergency access to the rehabilitated structure would occur outside of the floodplain. The County reevaluated the alternatives based on the project impacts and determined that there is no practicable alternative to locating the project on a site in which a portion is in the floodplain. This is due to: 1) the need to locate the project on land accessible to the project sponsor/County; 2) the need to construct an economically feasible project, which is accomplished by reusing an existing structure; 3) the site's access to services and amenities (i.e. public transportation); 4) the ability to develop the project at the proposed site with no significant increased risk to life or property loss; and 6) the previously disturbed nature of the site and lack of natural floodplain values and functions. The proposed project would include storm shutters for windows and doors, which would decrease the possibility of damage from storms, and would be required to purchase flood insurance for the property. Therefore, with the 8-Step Process, the project will be in compliance with Executive Order 11988.

Supporting documentation

[1251 S Eliseo Dr_ 8-Step Documentation_ 2022-0421.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)
 No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

Select all consulting parties below (check all that apply):

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
- ✓ Graton Rancheria Completed

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

The project site is constructed on artificial fill over marshland reclaimed in the 1960s. The results of the background research indicate that the project site has a low potential for precontact and historic-era archaeological resources. The proposed project would comply with Larkspur Municipal Code Chapter 15.42.030(C), which requires project activities to stop if recorded or unrecorded archaeological resources are encountered during construction and an archaeological investigation permit has not been issued. To comply with the consultation requirements of Section 106, the County sent letters to culturally-affiliated Native American tribes with interest in the APE and vicinity. On February 1, 2022, the Federated Indians of Graton Rancheria (Graton) responded that they were interested in consulting on the proposed project. On March 16, 2022, County representatives and Graton tribal members held a virtual meeting to discuss the proposed project and any potential impacts. Despite the low sensitivity for intact pre-contact cultural materials to be in the APE, the results of consultation indicate that there is the potential that the fill layer may contain redeposited cultural materials. Graton indicated during consultation that the project site remains sensitive for cultural materials to potentially be in the artificial fill layer. Therefore, the tribe has requested archaeological and tribal monitoring during ground disturbing activities associated with the proposed project, including pavement removal and minor landscaping. As a result, cultural resources monitoring, inadvertent discovery of cultural materials, and inadvertent discovery of human remains mitigation measures would be implemented. The property was constructed in 1969 as a skilled nursing facility and meets the historic age criteria. In support of Section 106 consultation, it has been evaluated and recommended not eligible for listing in the National Register of Historic Places. No other historic-age properties are within the APE. The County sent a letter to the SHPO on March 17, 2022. On April 11, 2022, the SHPO provided concurrence with the finding of No Historic Properties Affected.

Document and upload all correspondence, notices and notes (including comments and objections received below).

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes

No

Step 2 – Identify and Evaluate Historic Properties

1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:

See attached APE in the Screen Summary at the conclusion of this screen.

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
1251 S. Eliseo Dr	Not Eligible	Yes	✓ Not Sensitive

Additional Notes:

2. Was a survey of historic buildings and/or archeological sites done as part of the project?

✓ Yes

Document and upload surveys and report(s) below.

For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

No

Step 3 –Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as

per guidance on direct and indirect effects.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Document reason for finding:

✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

The project site is constructed on artificial fill over marshland reclaimed in the 1960s. The results of the background research indicate that the project site has a low potential for precontact and historic-era archaeological resources. The proposed project would comply with Larkspur Municipal Code Chapter 15.42.030(C), which requires project activities to stop if recorded or unrecorded archaeological resources are encountered during construction and an archaeological investigation permit has not been issued. To comply with the consultation requirements of Section 106, the County sent letters to culturally-affiliated Native American tribes with interest in the APE and vicinity. On February 1, 2022, the Federated Indians of Graton Rancheria (Graton) responded that they were interested in consulting on the proposed project. On March 16, 2022, County representatives and Graton tribal members held a virtual meeting to discuss the proposed project and any potential impacts. Despite the low sensitivity for intact pre-contact cultural materials to be in the APE, the results of consultation indicate that there is the potential that the fill layer may contain redeposited cultural materials. Graton indicated during consultation that the project site remains sensitive for cultural materials to potentially be in the artificial fill layer. Therefore, the tribe has requested archaeological and tribal monitoring during ground disturbing activities associated with the proposed project, including pavement removal and minor landscaping. The project would implement cultural resources

monitoring. Despite the low potential for encountering cultural materials and/or human remains, the possibility of encountering these materials cannot be entirely discounted when an archaeologist and tribal monitor are not present. Therefore, the proposed project should also implement inadvertent discovery of cultural materials and human remains measures. These measures, as well as the cultural resources monitoring measure, are included in the project's mitigation plan. Regarding historic resources, the property was constructed in 1969 as a skilled nursing facility and meets the historic age criteria. In support of Section 106 consultation, it has been evaluated and recommended not eligible for listing in the National Register of Historic Places. No other historic-age properties are within the APE. The County sent a letter to the SHPO on March 17, 2022. On April 11, 2022, the SHPO provided concurrence with the finding of No Historic Properties Affected. Therefore, the project is in compliance with Section 106.

Supporting documentation

[1251 S Eliseo Dr S106 Report_final_20220427.pdf](#)
[SHPO Response Letter_2022-04-11.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

New construction for residential use

Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
None of the above

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

- ✓ Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: 54

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 54

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Screen Summary

Compliance Determination

The acceptable exterior noise level set forth by HUD regulations for new construction of housing is 65 DNL or less. DNL is a 24-hour average noise level with a 10 decibel (dBA) penalty for noise occurring during the nighttime hours, defined as 10 p.m. to 7 a.m. The regulations consider the range between 65 dBA DNL and 75 dBA DNL to be normally unacceptable, as long as appropriate sound attenuation measures are provided. A DNL of greater than 75 dBA is considered unacceptable. A Noise

Assessment was conducted. ESA modeled noise levels at the project site using the HUD DNL Calculator, which requires assessing noise impacts from roadways up to 1,000 feet away and railways up to 3,000 feet away that could potentially affect noise at the project site. The arterial roadway within 1,000 feet of the project site included in the analysis is Bon Air Road. Existing traffic volumes for this roadway were obtained from the Transportation Authority of Marin. Average daily traffic volumes were used in the HUD DNL Calculator to estimate the ambient noise level at the project site from the roadway source. There are no railways located within 3,000 feet of the project site. Only one airport is located within the preliminary 15-mile screening distance from the project site. San Rafael Airport is located approximately 4.8 miles to the north. However, the project site is located several miles outside of the 55 dBA and 60 dBA Community Noise Equivalent Level (CNEL) airport noise contours based on figures contained in the San Rafael General; Plan. Consequently, the contribution of airport noise from San Rafael Airport would not materially contribute to the noise environment at the project site and was not included in the HUD DNL Calculator assessment. The DNL exterior noise from arterial roadway sources was calculated to be 54 dBA DNL at the project building on South Eliseo Road. This would fall within HUD's "acceptable" range, which is less than 65 dBA DNL. Since the project site would not be exposed to noise levels exceeding 65 dBA DNL, attenuation measures beyond State and local law would not be required to ensure interior noise standards are met. Title 24 of the California Code of Regulations establishes uniform noise insulation standards for multi-family residential projects. Multi-family residences must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 dBA. Construction Noise - The Larkspur Municipal Code Section 9.54.060 exempts noise associated with construction, repair, remodeling, demolition, or paving of any real property, including noise from vehicles and equipment associated with these activities, provided they are limited to between the hours of 7:00 am and 6:00 pm Monday through Friday, and between the hours of 9:00 am and 5:00 pm on Saturday. Construction activities associated with the proposed project would occur within the allowed hours specified in the Larkspur Municipal Code. Therefore, project-related construction activities would comply with the Larkspur Municipal Code and construction noise impacts would not be adverse. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[17_2022_0201_DNL_Calculator - HUD Exchange.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

Based on the response, the review is in compliance with this section.

No

Screen Summary

Compliance Determination

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project site is not served by a U.S. EPA designated sole-source aquifer, is not located within a sole source aquifer watershed, and would not affect a sole-source aquifer. The project site would be entirely served by the existing municipal water supply, which is the current site condition. Therefore, the project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[18_2022_0103_EPA_SoleSourceAquifer_GroundWater_Region9.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

✓ No

Based on the response, the review is in compliance with this section.

Yes

Screen Summary

Compliance Determination

The project site is located on a parcel immediately north of Corte Madera Creek, a tidal wetland that is located approximately 20 feet from the rear of the existing building. Project construction would involve an interior remodel, landscaping, and resurfacing the existing parking lot. Two trees would be removed; one is a eucalyptus tree with a diameter of 20 inches located adjacent to the parking lot in front of the building along South Eliseo Drive; and the other is an ornamental pear tree with a diameter of 6 inches located in a courtyard surrounded by the building. Neither tree meets the definition of a heritage tree pursuant to Larkspur Municipal Code Section 12.16.010, which states a tree must have a trunk with a circumference of 50 inches or more. Therefore, all construction and tree removal would occur in developed areas away from Corte Madera Creek and the project is not expected to affect wetland or riparian areas. The project is in compliance with Executive Order 11990.

Supporting documentation

[19_2022_0106_NWI_Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

The nearest river listed in the National Wild and Scenic River System is a 23-mile segment of the American River, which is located 72 miles northeast of the project site. The nearest river classified as a potential candidate for inclusion in the National Wild and Scenic River System is Olema Creek, located approximately 10.5 miles west of the project site. Due to the distance between the project site and these rivers, the proposed project would not affect a wild and scenic river. Implementation of the project would not conflict with the provisions of the Wild and Scenic Rivers Act, and the project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[41_202_0322_NationalParkService_NationwideRiversInventory.pdf](#)

[21_2022_0103_NationalWildandScenicRiversSystem_Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?

Yes

No

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

No

Explain:

The project site is currently occupied by an existing vacant building and a parking lot, and contains no residential population. Thus, no residents would be permanently displaced with implementation of the proposed project. The project site is located in Census Tract 6041119201 as identified in the 2020 United States Census. Within this tract, approximately 33.9 percent of the population is comprised of ethnic minorities and approximately 23 percent of the population has an income below twice the poverty line, which is higher than 41 percent of the census tracts in California. Twice the poverty level is used by the California Environmental Health Hazard Assessment (OEHHA) in its California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0, which is a screening methodology that is used to help identify communities that are disproportionately burdened by multiple sources of

pollution. Because the project area population is not comprised of a majority ethnic and racial minority population, and because the project area does not have a meaningfully greater percentage of the population living below twice the poverty level than the State of California, the project area is therefore not considered an environmental justice population. As such, no impacts on environmental justice populations would occur.

Based on the response, the review is in compliance with this section. Document and upload any supporting documentation below.

Screen Summary**Compliance Determination**

Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The project is in compliance with Executive Order 12898.

Supporting documentation

[22_2022_0103_CAOofficeofEnvHealthHazardAssessment_CalEnviroScreen4.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No