

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

Project Information

Project Name: HBoM-HUD-Parcel-Veterans-Housing

HEROS Number: 900000010231957

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

RE Preparer: Tamara Taylor

State / Local Identifier: Homeward Bound of Marin

Certifying Officer: Matthew Hymel

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): Sicular Environmental Consulting

Point of Contact: Daniel Sicular

Project Location: 826 State Access Road, Novato, CA 94949

Additional Location Information:

Marin County Assessor as Parcel Number (APN) 157-970-07

Direct Comments to: federalgrants@marincounty.org
Marin County Community Development Agency- Federal

Grants Division
3501 Civic Center Drive, Room 308
San Rafael, CA 94903

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

Homeward Bound is developing the 'HUD Parcel' - a 2.8-acre site on the former Hamilton Army Airfield in Novato. This \$30 million project will create an affordable housing community for homeless veterans and people transitioning from homelessness into the local workforce, and expand on Homeward Bound's successful culinary job training program and social enterprises. 50 one-bedroom units of permanent supportive housing will be built next to existing training and housing programs operated onsite by Homeward Bound for more than 20 years. The overall scope of this project includes demolition of three disused military warehouses currently on the property and development of the remaining parcel to complete a coherent campus of services designed to collectively address homelessness in Marin. As a decommissioned military base, HUD approved the Hamilton Reuse Plan for this site under the McKinney Act, which included a Legally Binding Agreement that the HUD Parcel be designated for homeless service uses, including housing, services, supportive employment, and job training. The current development plan not only fulfills the original reuse intentions for the site but also meets a critical need for more affordable housing in our community and will create the first permanent supportive housing in Marin dedicated to helping veterans end their struggle with homelessness. Phase I Construction: 24 Veterans Housing Apartments Because of intensive efforts to end veteran homelessness in Marin, including HUD-VASH and Homeward Bound's VA per diem transitional beds already located onsite, these 24 two-story, one bedroom apartments will be able to house all remaining homeless veterans in our community, making our county one of the first in the state to ensure every former service member has a place to call home. Site-based apartment housing with 8-hour-a-day, 5-days-a-week on-site case management and intensive services is a model that is currently lacking in Marin but is critically needed to meet the needs of highly vulnerable veterans experiencing homelessness. Phase II Construction: 26 Workforce Housing Apartments and Expanded Social Enterprises 26 two-story, one bedroom apartments will provide affordable housing for both families and single adults who are leaving homelessness behind them and re-entering the local workforce. In addition, a manufacturing bakery and educational center for Homeward Bound's social enterprises will be built to expand on current programs that train people for jobs and provide opportunities for community engagement. The total building area for this project is 45,454 square feet, including: -17,428 square feet for the veterans housing component -17,266 square feet for the workforce housing component -10,800 square feet for the job training and social enterprises component The project includes 50 one-bedroom units of permanent supportive housing, an education center, and a manufacturing bakery to allow continued growth of Homeward Bound's housing, training, and social enterprise programs.

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

This project will create an affordable housing community for homeless veterans and people transitioning from homelessness into the local workforce, and expand on Homeward Bound's successful culinary job training program and social enterprises. 50 one-bedroom units of permanent supportive housing will be built next to existing training and housing programs operated onsite by Homeward Bound for more than 20 years. HUD approved the Hamilton Reuse Plan for this site, which is part of a decommissioned military base, under the McKinney Act, which included a Legally

Binding Agreement that the site be used for homeless services, including housing, services, supportive employment, and job training. The current development plan not only fulfills the original reuse intentions for the site but also meets a critical need for more affordable housing in our community and will create the first permanent supportive housing in Marin dedicated to helping veterans end their struggle with homelessness.

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

The project site, known as the "HUD Parcel," is a 2.8 acre, irregularly-shaped parcel of land within the City of Novato (APN 157-970-07). The project site, which is zoned PD (Planned District), is developed with three warehouse buildings, which were part of the former Hamilton Air Force Base (previously called the Hamilton Army Air Field). One of the buildings is currently used as automobile impoundment and storage by the City of Novato Police Department (NPD), while the other two are used for costume and theater props storage by the City of Novato. The Hamilton Army Air Field facility was constructed between 1932 and 1935 and encompassed approximately 927 acres. The base was expanded and further developed during World War II. In 1947, the facility was transferred to the United States Air Force and was renamed Hamilton Air Force Base. By 1964, additional housing to the west increased the size of the base to 2,184-acres. In 1974, the U.S. Air Force deactivated the facility and initiated transfer of excess area. Since decommissioning, much of the base has been redeveloped as residential, commercial, public facility, and open space uses, with many of the military structures demolished or repurposed for civilian use. Portions of the former base containing original structures from the 1930s are included in the Hamilton Army Air Field Discontiguous Historic District, which is listed on the National Register of Historic Places. The project site is located on the south side of Hamilton Parkway and north of State Access Road. The SMART commuter rail track and right-of-way run between the northeastern property boundary and Hamilton Parkway, with the nearest station, the Novato-Hamilton station, located about 1/2 mile to the southeast. Access to the Property is provided from Hamilton Parkway via Puetts Way. The SMART Trail, a walking and biking path, runs along the portion of the right of way to the southeast and is accessible from State Access Road. In addition to the existing structures, most of the property is paved. The project site is mostly flat, though the southern portion, where two of the buildings stand, is elevated several feet above the northern portion. The site drains via sheet flow toward the northeast and northwest, and ultimately into the existing ditch on the west side of the SMART tracks. Surrounding land uses include Homeward Bound's existing campus to the north, and, to the south, the recently completed Novato Village Senior Apartment Homes, and the Ascend at Hamilton Field housing development, which is still under construction. To the northwest is the Hamilton-Ignacio Terminal for the Marin Airporter airport bus service, then, across Hamilton Parkway, a hotel and shopping center. To the northeast across Hamilton Parkway there is a skatepark, then areas of the old Hamilton Air

Force Base that have not been redeveloped. To the west is an undeveloped area consisting of a small, rocky hill, portions of which appear to have been quarried, then Nave Drive and US 101. In the absence of the project, the redevelopment of the former base as civilian uses can be expected to continue. The project site itself has been dedicated for use for homeless services, including housing, services, supportive employment, and job training. Therefore, in the absence of this project, another similar project is likely to be proposed for this site.

Maps, photographs, and other documentation of project location and description:

[IMG_20220525_120038771_HDR.jpg](#)

[IMG_20220525_120025595_HDR.jpg](#)

[IMG_20220525_115043753.jpg](#)

[IMG_20220525_114622822_HDR.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:

[Homeward Bound EA sig page 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
B-22-UC-06-0004	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)
B-22-UC-06-0004	Community Planning and Development (CPD)	HOME Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$780,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$31,000,000.00

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 closest airports are San Rafael Airport, a civilian airport about 3 miles to the south, and Gness Field, also a civilian airport, about 6 miles north of the project site, as shown in the attached map. The project is in compliance with Airport Hazards requirements.
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, 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area, as shown on the Firmette map in the ERR. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Comparison to Federal De Minimis Levels Marin County is marginal non-attainment for 8-hour ozone and moderate non-attainment for PM2.5.

		<p>The San Francisco Bay Area Air Basin is also designated maintenance for CO. The de minimis levels that apply to the Project are 100 tons per year for VOC, NOx, PM2.5 and CO (https://www.epa.gov/general-conformity/de-minimis-tables). Project construction would generate a maximum of approximately 0.47 tons per year of VOC, 1.17 tons per year of NOx, 0.05 tons per year of PM2.5, and 1.34 tons per year of CO. Project operation would generate approximately 0.28 tons per year of VOC, 0.18 tons per year of NOx, 0.04 tons per year of PM2.5, and 0.86 tons per year of CO. Thus, Project construction and operation would be below the federal General Conformity de minimis levels pursuant to the 1990 amendments to the Federal 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>This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The San Francisco Bay Conservation and Development Commission (BCDC) has authority under Section 307 of the federal Coastal Zone Management Act (CZMA)(16 U.S.C. section 1456) over federal activities and development projects and non-federal projects that require a federal permit or license or are supported by federal funding and that are within the jurisdictional area of the BCDC, which includes the Bay itself and land within 100 feet of the Bayshore). The project site is not within BCDC jurisdiction. The project is in compliance with the Coastal Zone Management Act.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	

<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area, as discussed in the Biological Resources Survey report in the ERR. See also biologist's site photos in the ERR. This project is in compliance with the Endangered Species Act.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A windshield survey, search of air photos, and database search revealed seven aboveground storage tanks within 1 mile of the project site. the HUD ASD tool was used to calculate the ASD for the nearest facility with the largest amount of stored flammable material. The project site is well beyond the ASD for this and all of the tanks identified. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements. See documentation in the ERR, including notes of phone conversations with City of Novato and Marin County staff confirming that no other major facilities, such as refineries, tank farms, etc., are within 1 mile of the project site.</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>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not occur in a floodplain. The project is 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>Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. Tribal consultation resulted in the preparation of a Cultural Resources Monitoring Plan. With implementation of this plan, which includes provisions for accidental discovery of archaeological resources, the project will not have a significant impact.</p>

		Implementation of the plan is included as a mitigation measure. The project is in compliance with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Noise Assessment was conducted. The noise level was acceptable: 58.0 db. See noise analysis (RCH Group, 2022) in the ERR. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. There are no NWI wetlands mapped within or adjacent to the project site. See discussion of wetlands in Biological Resources Survey report in the ERR for the Endangered Species section. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. 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	<p>Affected Environment The project site consists of a single parcel of approximately 2.64 acres (Assessors Map). It is located within the Hamilton Field area, formerly the Hamilton Air Force Base, in an area now characterized by mixed uses, including multi-family and single-family housing, commercial, public services, and transportation. The project site is currently developed with three warehouses, part of the old Air Force Base, and now used for storage. The parcels immediately to the north are part of Homeward Bound's Novato campus, which includes a homeless shelter, transitional housing, and administrative offices. The Novato General Plan 2035, adopted in 2020, shows the project site within the Hamilton-Bel Marin Keys area of the City. The project site has a land use designation of CF (Community Facilities, Public Utilities and Civic Uses) (City of Novato, 2020a - General Plan 2035). The CF category has a building density and intensity of 10.1 to 20.0 dwelling units per gross acre in mixed use development, with a maximum FAR of 0.8. This land use designation is applied to areas suitable for public land uses, including certain</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>open space and recreation uses. Additionally, education, assembly, medical, research and development service, residential and utility uses may be allowed. The site is zoned PD (Planned District). Development within this Planned District is governed by the 1996 Hamilton Field Reuse Plan, which identifies the parcel within Planning Area 4, Commissary Triangle, where the identified land use is CFCU-SP (Community Facility and Civic Uses - Special Uses Permitted). The Reuse Plan specifically states that the Hamilton Service Center, an 80-bed emergency shelter housing facility, is an allowed use, though notes that this use will require buffering from adjacent residential uses with setbacks, fencing, and landscaping. The Reuse Plan also specifies that the maximum allowable FAR within the Commissary Triangle Area is 0.40, and building heights are restricted to a maximum of 30 feet. (Hamilton Local Reuse Authority, 1996). The project site is in close proximity (walking distance) to a large supermarket and other commercial services including restaurants, a hotel, and coffee shops, and is also well served with transit, walking,</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>and biking infrastructure.</p> <p>Impact Evaluation The project proposes 50 units on 2.64 gross acres, or about 19 units per acre, which is consistent with the General Plan land use designation. With the proposed development of a total of 45,454 square feet, FAR would be .395, well within the General Plan maximum for this land use designation and also within the Hamilton Field Reuse Plan FAR limit of .4. At a peak building height of 29'-7", the proposed design is also within the height limit of 30'. The proposed use is consistent with the General Plan land use designation, zoning, and Hamilton Reuse Plan land use designation for the site. The City of Novato Design Review Commission (DRC) held a public design review workshop for the project on December 4, 2019, at which the DRC suggested several architectural changes which were subsequently incorporated into project plans. At its meeting on January 15, 2020, the DRC found that the revised project's Spanish themed architecture, landscaping, pedestrian pathways, building massing and parking design integrate features found throughout the existing Homeward Bound campus and</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>that of the greater Hamilton area, and that the Project's site design and building massing are sensitive to and compatible with the surrounding ambiance, topography, scale of development, architecture style, and landscaping of development found in the surrounding neighborhood. In sum, the DRC found that the design, layout, and appearance of the project are consistent with the City's design guidelines and code provisions (City of Novato, 2020b - Design Review).</p>	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	<p>Affected Environment The project site is nearly flat, with an average slope of 3.53 percent (MarinMap, 2022 - Parcel Report), and contains a raised terrace where two of the existing warehouse buildings stand. According to a Preliminary Hydrology and Hydraulic Analysis prepared for the project (CSW-ST2, 2021), the project site currently drains via sheet flow to the northwest and northeast, with stormwater entering existing bioretention facilities located on the adjoining Homeward Bound parcels before ultimately entering a drainage ditch along the SMART track. The site has been graded and most of it has been built on or</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>paved. The project site is located in the Coast Ranges geomorphic province of California, which is typified by generally northwest-trending ridges and intervening valleys formed as a result of movement along a group of northwest-trending fault systems, including the San Andreas Fault. Bedrock geology within Marin County is dominated by sedimentary, igneous, and metamorphic rocks of the Jurassic-Cretaceous age Franciscan Complex. The project site is underlain by Quaternary (geologically recent) alluvium, described as unconsolidated deposits of silt, clay, sand, and gravel, transported and deposited in stream channel environments (Miller Pacific Engineering Group, 2019). The results of a subsurface exploration generally confirm the regionally-mapped geology. Test borings encountered approximately 3.5 to 6-feet of medium dense to dense sandy fill underlain by 5 to 11-feet of interbedded loose to medium dense clayey sand, soft silty clay, and medium dense sand over weathered sandstone bedrock. Groundwater was measured at depths ranging from 6 to 12-feet (ibid). Impact Evaluation A</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>stormwater control plan (CSW-ST2, 2022) was prepared for the project. The stormwater control plan indicates that the project will increase impervious area by less than 2,000 square feet. To improve drainage, a new, 1,104 square foot bioretention basin would be developed in the eastern corner of the site. The existing bioretention facilities within the already-developed Homeward Bound parcels to the north would continue to receive runoff from the project site. With the addition of a new bioretention facility, stormwater management would be improved above existing conditions, and would not result in an impact. Implementation of Best Management Practices during construction, as required under the Construction General Permit, would minimize erosion and sedimentation during construction. According to the geotechnical investigation for the project, The principal geologic hazards which could potentially affect the project site are strong ground shaking, localized liquefaction and consolidation of soft clay layers. Other hazards are not considered significant at the site (Miller Pacific Engineering</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Group, 2019). The geotechnical investigation includes recommendations for site grading and foundation systems to address these issues, and concludes that they would be effective in reducing to insignificant potential impacts of site geology and soils on structural stability and life safety of inhabitants (ibid). These recommendations have been incorporated into the project design.</p>	
<p>Hazards and Nuisances including Site Safety and Site-Generated Noise</p>	2	<p>Hazards and Nuisances, Including Site Safety and Noise Affected Environment The project site is underlain by alluvium (MarinMap, 2022 - Geology). Site soils are classified as xerorthents-urban land complex, 0 to 9 percent slopes (MarinMap, 2022 - Soils). As with the entire Bay Area region, the site is subject to strong shaking during an earthquake. The closest major active faults are the San Andreas Fault located about 12 miles to the west, and Hayward-Rogers Creek Fault located about 5.5 miles to the east (California Geological Survey (CGS), 2022). US 101, a major freeway, is located approximately 1,000 feet west of the project site. The SMART rail right of way is immediately adjacent to the project site. A gas station is located about</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>900 feet to the northwest. A power transmission line runs about 100 feet from the project site, between the SMART rail right of way and Hamilton Parkway. As discussed in the noise analysis conducted for this EA (see Noise section in Related Laws and Authorities), ambient noise levels within the project site are generally within the 50-60 db range. Impact Evaluation Geologic hazard mapping and the project's geotechnical report indicate that the project site has a low to moderate probability of liquefaction, landsliding, expansive soils, debris flows, tsunami, or extreme shaking during an earthquake (MarinMap, 2022, Miller Pacific Engineering Group, 2019). While the project site is expected to experience strong shaking during a major earthquake on one of the major faults in the region, the site is not within an earthquake fault rupture zone (MarinMap, 2022, Parcel Report). While there is a low hill to the west of the project site, there are no steep, high slopes that could produce landsliding, avalanches, mudslides, or debris flows. The site is not within the wildland-urban interface, and so is not at high risk of wildfire</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>(MarinMap, 2022 - WUI). The project site is mapped by FEMA within Zone X, an area of minimal flood hazard (FEMA, 2022). As described under Climate Change, below, the project site is not expected to be adversely affected by future rise in sea level or flood level. The Bay Area region is not subject to tornadoes, hurricanes, or sandstorms. There are no active volcanos in the area. There is a low likelihood of poisonous animals or plants occurring on the project site. The Bay Area Air Quality Management District's Planning Healthy Places interactive map shows locations subject to high levels of air pollution, including from major roadways, railways, and industrial facilities. The project site is mapped outside of areas of high pollution concentration (BAAQMD, 2022a). The SMART train right of way is fenced. Most roadways in the project area have sidewalks and crosswalks at intersections. The existing structures within the project site may pose an attractive nuisance, but they will be demolished as part of the project. Most other parcels adjoining the project site have been developed, and are fenced and landscaped. There are no known hazardous or</p>	

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LAND DEVELOPMENT			
		<p>contaminated sites within or adjacent to the project site. Passing trains cause some noise and vibration, but the SMART rail is a light commuter rail that runs mostly during commute hours, and poses a minor nuisance. Existing noise levels within the project site are generally low. As other parcels adjoining the project site have already been redeveloped, there are no anticipated major construction noise sources that could impact future project residents. In summary, there are no recognized hazards or nuisances that would render the project site unsuitable for residential use.</p>	
Energy Efficiency	2	<p>Affected Environment The project site is located proximate to transportation, retail, and community services. Existing utility connections are present. Impact Evaluation This project will convert the project site from an underutilized lot containing derelict military buildings into residential housing units and a job training and education center. This will lead to increased energy consumption compared to the existing use. However, project design and construction will be subject to the California Green Building Standards Code (Title 24, Part</p>	

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LAND DEVELOPMENT			
		<p>11, of the California Code of Regulations), known as CalGreen. CalGreen was adopted with the purpose of improving public health, safety, and general welfare through enhanced design and construction of buildings, using concepts which reduce negative impacts and promote those principles which have a positive environmental impact and encourage sustainable construction practices. CALGreen addresses planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Given that the project site is within walking distance of retail and transit, and with the energy efficiency requirements of CalGreen, the project can be expected to achieve a high level of energy efficiency and low per capita energy consumption.</p>	
SOCIOECONOMIC			
Employment and Income Patterns	1	<p>Affected Environment The City of Novato is a largely suburban community. Employment is concentrated in the downtown area and in retail and office areas scattered throughout the city, including fourteen neighborhood shopping centers (City of Novato, 2020b - General Plan 2035). Within</p>	

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LAND DEVELOPMENT			
		<p>the Hamilton Field area, commercial areas include a shopping mall and hotel located just north of the project site, as well as commercial and light industrial businesses inhabiting several of the former airplane hangars in the eastern part of Hamilton Field. Novato Industrial Park, a 200-acre area developed in the 1980s containing a mix of light industrial, commercial and office uses, is just to the north of the Hamilton Field area. The largest tenant is BioMarin, which has approximately 405,000 square feet of pharmaceutical manufacturing, laboratory, office and warehouse space. The US Census Bureau gives Novato's median household income as \$101,629 and the per capita income as \$55,813. 62.3% of the population over age 16 are in the labor force. The poverty rate for the City is approximately 6.4%. (US Census Bureau, 2022). Impact Evaluation The project will increase temporary labor needs for project construction. Once built, the project will provide seven new full-time employment positions, two serving as housing coordinators and five working in the bakery, culinary office and events building. This project will serve homeless</p>	

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		<p>veterans, families, and individuals transitioning from homelessness into the local workforce, including providing job training. The project will provide housing in an area that is served by public transportation, allowing residents access to jobs throughout the County and beyond without the need for an automobile. The new full-time positions will likely be filled from the local or regional labor pool. The project will provide a beneficial impact, by providing employment positions and job training.</p>	
Demographic Character Changes / Displacement	1	<p>Affected Environment The population of the City of Novato, according to the US Census Bureau, is 52,708 as of July 1, 2021. Among this total, approximately 23.3% are aged 65 years and older and 18.6% are aged under 18. The population is largely White (70.7%). Latinos comprise the next largest group (20.5%) (US Census Bureau, 2022). Most housing (69.9%) in Novato is owner-occupied; the median gross rent is \$1,975. Approximately 94% of households have access to a computer and/or broadband subscription (ibid). Impact Evaluation As the project will have a limited construction timeframe and will likely draw from the local labor force the</p>	

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LAND DEVELOPMENT			
		<p>project would not be likely to impact the local physical, social, and psychological dimensions of the community. The project would not displace any population as the project site currently contains no housing units. The project will assist the community by providing transitional and supportive housing and job training specifically for homeless veterans: the project will provide a benefit by helping to reduce homelessness and unemployment in Marin County.</p>	
COMMUNITY FACILITIES AND SERVICES			
<p>Educational and Cultural Facilities (Access and Capacity)</p>	<p>1</p>	<p>Affected Environment According to their website, the Novato Unified School District (NUSD) has 7,500 students and approximately 800 staff members in seven elementary schools and one K-8 school. Class Size Reduction has been implemented in Grades K-3 at all elementary schools, resulting in a student to teacher ratio of 22:1. There is also one K-8 charter school operating under NUSD, along with two middle schools and two comprehensive high schools. NUSD also has an Education Center housing a continuation high school and an independent study student program serving grades K-12. All schools within the Novato</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Unified School District offer special education services, along with Gifted and Talented Education. Special assistance is provided for all English learner students. NUSD also offers Adult Education classes including a Diploma Class, Credit Recovery, GED Prep, and English as a Second Language Class (ESL). These programs serve adults who have not yet completed their high school education as well as those wanting to continue their education. The District has an active volunteer program. Parent groups, including School Fuel, NUSD's educational foundation, augment the athletic and fine arts program (NUSD, 2022). The Indian Valley Campus of the College of Marin, a community college, is located within the City of Novato, about 3 miles west of the project site. There are also numerous private schools within the City. The South Novato Library and Marin Makerspace are located close to the project, on C Street, within easy walking distance. The Hamilton Army Air Field Discontiguous Historic District, which includes portions of the former Air Force Base, is listed as an Historic District on the National Register of Historic Places (National Park Service,</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>2022). There are numerous historic buildings still extant within the Historic District, though none in close proximity to the project site, which is outside of the Historic District. Cultural facilities within Hamilton Field include the Marin Museum of Contemporary Art, the Hamilton Field History Museum, and the Hamilton Community Center. Impact Evaluation As discussed in the Related Laws and Authorities, Historic Preservation section, the project would not have an adverse impact on historic resources, because there are no historic properties within the APE. Because the project will provide permanent and transitional housing for homeless veterans in small apartments (studio and one-bedroom), few school-aged children are expected as future residents. Therefore, the project is not expected to place a substantial demand on the public school system. The proximity of educational (including community college) and cultural facilities to the project site will be an advantage for future residents, providing a rich cultural environment and enabling easy access for veterans transitioning out of homelessness.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Commercial Facilities (Access and Proximity)	2	<p>The project site is in a mixed-use area that includes commercial facilities. A major supermarket, a hotel, restaurants, a bank, and other services are within the commercial area just north of the project site, within easy walking distance. A regional shopping mall, Vintage Oaks, with a Costco, Target, Ross Dress for Less, and other retail outlets, is located about two miles north (Google Maps, 2022 - Vintage Oaks). It is accessible from the project site via several Marin Transit bus lines, a trip of 30-45 minutes (Marin Transit, 2022 - Service Map). Another shopping mall, Pacheco Plaza, with a wider array of locally-serving retail and services, is located less than a mile away, across the US 101 freeway (Google Maps, 2022 - Pacheco Plaza). Pacheco Plaza can be accessed from the project site with a two-minute bus ride and 10 minute walk: the Marin Transit #49 bus runs every half hour throughout the day on weekdays, and hourly weekends and holidays (Marin Transit, 2022 - Route 49 Schedule). Other regional shopping facilities are accessible via the SMART train and other public transit.</p> <p>Impact Evaluation Commercial facilities are easily</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>accessible through a variety of transportation modes, including walking and bicycling. A mixture of facilities will allow future residents to shop both locally and, if needed, at regional facilities. The available goods and services should be adequate to meet the needs of future residents.</p>	
<p>Health Care / Social Services (Access and Capacity)</p>	<p>2</p>	<p>Affected Environment The City of Novato and Marin County are well served with health care facilities. Novato Community Hospital, which has an emergency room, is located about 2 miles north of the project site (Google Maps, 2022 - Novato Community Hospital). It is accessible by bus service with a 30-minute ride (Marin Transit, 2022, Service Schedule). A cluster of medical offices is located close by the hospital. Marin Health Medical Center (formerly Marin General Hospital) is located in Kentfield, 7.5 miles from the project site, about a 1-hour bus ride away (Google Maps, 2022 - Marin Med Center). There are numerous other medical offices around Novato. There is a pharmacy in the Safeway supermarket across the street from the project site. The project sponsor, Homeward Bound of Marin, will provide social services for project residents.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Homeward Bound is Marin County's chief provider of shelter, housing and support services for families and individuals experiencing homelessness. Homeward Bound has other facilities adjacent to the project site, including a homeless shelter, culinary training academy, event facility, and organic garden. Impact Evaluation Given that the area around the project site is well-served with medical facilities, including major hospitals, and that social services will be provided on-site by the project sponsor, Homeward Bound of Marin, the project is not anticipated to burden the existing health care system and social services available in the community.</p>	
<p>Solid Waste Disposal and Recycling (Feasibility and Capacity)</p>	<p>2</p>	<p>Affected Environment The Novato Sanitary District provides solid waste, recycling, and composting collection services for residential and commercial customers in the Hamilton Field area of Novato though its franchised service provider, Recology of Sonoma-Marin. Diversion of the majority of solid waste from landfills is required by California State Law, as is the requirement to include adequate space within garbage enclosures for new multi-family construction to enable storage and collection</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>of recyclable materials. Recology of Sonoma-Marin direct hauls solid waste to the Redwood Landfill, located several miles north of the project site. As of 2018, Redwood Landfill had remaining capacity for an estimated minimum of 15 years, and potentially up to 32 years, if Marin County's Zero Waste goals are met (Marin County Hazardous and Solid Waste Management Joint Powers Authority, 2018). There are several other large landfills in the region. California law also requires recycling of construction and demolition debris. Impact Evaluation Once constructed, the Project will be served with existing solid waste, composting, and recycling services. During construction, construction and demolition debris will be processed for recycling. There is adequate facility capacity to handle all solid waste streams from the project.</p>	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	<p>Affected Environment The Novato Sanitary District maintains the sanitary sewer system within the Hamilton Field area and operates a wastewater treatment plant. The plant was recently (2011) reconstructed. The District, in partnership with the North Marin Water District, also</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>operates a water recycling facility in conjunction with the wastewater treatment plan, delivering up to 1.7 million gallons per day of tertiary treated recycled water used to offset potable water demand in Novato. Beginning around 2000, the District initiated sewer collection system master plan efforts for upgrades, improvements and maintenance needed for the approximately 250 miles of sewer pipelines, 40 pump stations and 6,000 manholes it maintains. Since then, the District has invested up to \$5 million annually in upgrades and maintenance to the collection system (Novato Sanitary District, 2022). Impact Evaluation The project site is adequately served with wastewater collection and treatment service. The project will not result in an exceedance of the existing system capacity.</p>	
Water Supply (Feasibility and Capacity)	2	<p>Affected Environment Municipal water supply for the Hamilton Field area is provided by the North Marin Water District (NMWD). The District has two sources of drinking water: a groundwater aquifer adjacent to the Russian River, and Stafford Lake, a local reservoir located just west of the City limits. Additionally, recycled water is</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>used for irrigation and some commercial applications. NMWD purchases approximately 80% of its supply from Sonoma County Water Agency (SCWA). Approximately 20% of Novato's water supply comes from Stafford Lake. The Stafford Lake Water Treatment Plant is typically operated in the late spring through early fall to supplement NMWD's purchased water supply. The amount of Stafford lake water used during the year depends upon the storage level attained from the previous winter's rainfall. NMWD is preparing a Local Water Supply Enhancement Study. The Study considers numerous options to develop new local water sources, with the goal of ensuring that the North Marin Water District has a solid, resilient strategy for sustainable water supply, to minimize the impacts of future droughts and the effects of climate change (NMWD, 2022). Impact Evaluation The project will connect to existing water supply infrastructure in accordance with state and local building codes. In accordance with code requirements, the project will incorporate water-saving features, including low-flow</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>toilets and showers, and drought tolerant landscaping. Because of the limited size of the project, its projected low water demand, and its consistency with growth projections for the City of Novato, it is not expected to result in a substantial demand on the existing water supply. The project will not, therefore, require additional water supplies.</p>	
<p>Public Safety - Police, Fire and Emergency Medical</p>	<p>2</p>	<p>Affected Environment The Novato Police Department provides response through patrol, investigations, traffic, narcotics enforcement, a School Resource Officer program, a 9-1-1 dispatch center, and disaster emergency services. The Department has approximately 80 staff members, including 60 sworn personnel and has an active volunteer program (City of Novato, 2022 - Police). Fire and emergency medical services are provided in the Hamilton Field area by the Novato Fire District. The District maintains five fire stations and one administrative headquarters office building. All five stations house full-time paid firefighters. The closest stations are Station 64, located at 319 Enfrente Road, less than one mile away, and</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Station 65, located within the Hamilton Field area on Bolling Drive, also less than one mile away. The District staffs eight engine companies, including structure and wildland engines, a ladder truck, Advanced Life Support ambulances, command chief officer, Rescue, and other support units. The District has a Class 1 Insurance Service Office rating. The District's goal is to maintain overall total response time of 8 minutes or less 90% of the time for all dispatched emergencies. Under daily normal conditions, there are 20 full-time professional emergency responders who can be deployed for an emergency within the boundaries of the District. In addition, the District serves as the primary Joint Emergency Operations Center (EOC) location for the City of Novato (Novato Fire District, 2022). Impact Evaluation The project area is well served with local police, fire, and emergency medical services. The supportive housing model used by Homeward Bound minimizes the need for public safety services and responses. The relatively small size of the development will add incrementally to the burden on public safety services, but</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		will not require expansion of existing facilities or create demand for additional staffing or services.	
Parks, Open Space and Recreation (Access and Capacity)	2	<p>Affected Environment There are numerous parks, open space areas, and recreational facilities within the Hamilton Field area, many within walking or short bicycling distance of the project site. The City of Novato Parks, Recreation, and Community Services Department manages the Novato Skate Park on Hamilton Parkway, just across from the Homeward Bound campus; Hamilton Community Gymnasium on Nave Drive; Thigpen Sports Courts on Crescent Drive, Hamilton Amphitheater Park on Hamilton Parkway; Hamilton Pool on El Bonito; South Hamilton Park on Hangar Avenue, the Reservoir Hill Vista Trail, which is accessible from Hamilton Parkway; and the Hamilton Community Center on South Palm Drive (City of Novato, 2022 - Parks). Open space areas include Hamilton Wetlands, along the edge of which runs the Bay Trail, a regional trail. There are no existing recreational, parks, or open space areas within the project site. Impact Evaluation The project will not displace any existing parks, recreational facilities, or open</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>space areas. The increase in population from occupancy of the 50 units that the project will develop can be expected to add incrementally to the demand for and use of parks, recreational facilities, and open space areas, but the abundance of such facilities and areas can easily accommodate the small increase in use, without the need for additional facilities.</p>	
<p>Transportation and Accessibility (Access and Capacity)</p>	<p>2</p>	<p>Affected Environment Marin Transit operates an extensive bus system with three routes passing close to the project site. The nearest bus stops are on Hamilton Parkway, by the Marin Airporter terminal; and across the street on Nave Drive, both a short walk from the project site. The #49 Downtown San Rafael-Novato, #251 Novato Hamilton-San Marin, and #257 San Rafael-Novato Ignacio buses all use these stops (Marin Transit, 2022 - Service Map). The Marin Airporter terminal is also a short walking distance. The Airporter provides bus service to San Francisco International Airport (Marin Airporter, 2022). The Sonoma-Marin Area Rail Transit, the SMART train, provides commuter rail service along the US 101 corridor between Sonoma County and the Larkspur Landing ferry</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>terminal. The Novato Hamilton stop is less than 1/2 mile from the project site. There is an extensive network of bicycle trails, lanes, and routes within the City of Novato, and throughout Marin County. The major roads near the project site all have dedicated bike lanes. There is also a bicycle/pedestrian trail along portions of the SMART train right of way, and bicycles can use the Bay Trail (Google Maps, 2022 - Bike Lanes). Cars and other motorized vehicles have ready access to local and regional roadways from the project site, including Hamilton Parkway, Nave Drive, and US 101. Walkscore.com gives the project site a Walk Score of 55 out of 100 ("somewhat walkable"), a Transit Score of 40 out of 100 ("a few nearby public transportation options") and a Bikeable Score of 67 out of 100 ("some bike infrastructure") (walkscore.com, 2022). The closest large intersection is the Nave Drive/Hamilton Parkway intersection, which is signalized. According to the General Plan 2035 Draft Environmental Impact Report, in 2016, that intersection was operating at Level of Service (LOS) B for both the AM and PM peak hours. The City of</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Novato's LOS standard is LOS D, so this intersection is operating adequately. Other intersections along Nave Drive were also operating at LOS A or B during peak hours in 2016 (City of Novato, 2020d - General Plan EIR). Impact Evaluation The project proposes 102 parking spaces. A parking and trip generation study was performed that concludes that the proposed number of parking spaces is sufficient to accommodate parking by residents (a 20 percent rate of car ownership is assumed, based on car ownership of residents of Homeward Bound's existing housing facility) as well as parking for events and job training activities, and that it exceeds City of Novato code requirements (W-Trans, 2022). The same study estimates that the project would be expected to generate an average of 104 vehicle trips daily, including 12 during the morning peak hour (average of one trip every 5 minutes) and 13 during the evening peak hour (average of one trip every 4.6 minutes). This would not be expected to substantially diminish intersection LOS at nearby intersections. The proposed residential buildings will all be designed for disability access. Per California Title 24, all the</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>ground floor residential units will be on an accessible path connecting them to the public right of way, accessible parking, and common areas both interior and exterior. There will be 12 ground floor accessible units in the Veteran's Building, 6 Mobility (fully accessible) and 6 Adaptable. There will be 15 ground floor accessible units in the Housing Building, 3 Mobility (fully accessible) and 12 Adaptable. The Events/Kitchen Building will be fully accessible. All buildings will have bicycle racks adjacent to them. Given the projected low trip generation, and the availability of transit, bicycle, and walking infrastructure, the project would not have a substantial adverse effect on traffic flow or parking.</p>	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	<p>Affected Environment The project site has been previously developed. It is devoid of unique natural features and has no water resources. The area around the project site is similarly developed, with the exception of a small hill, called Christmas Tree Hill, to the west of the project site. This hill, while not built upon, has been extensively altered in the past, and no longer has the</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		appearance of a natural landform. Impact Evaluation The project would not affect any unique natural feature or water resource.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	3	Affected Environment A biological study was performed for this review by JK Botany & Wetlands Science (JK Botany, 2022). Several data bases were searched to determine the potential for the occurrence of state and federally threatened and endangered species at the project site. JK Botany also performed a site reconnaissance survey, which found that the project site is mostly paved, with areas of mowed and unmanaged grassland occurring around the existing buildings. The eastern border of the site abuts an area vegetated with small-sized live oak trees, coyote brush, and ruderal vegetation that creates a buffer between the parcel and the SMART train tracks located further east. Small patches of non-native annual grassland and ruderal vegetation were identified within the project site. A drainage ditch on the south side of the westernmost building was observed to be obstructed with sediment. Some wetland plant species were observed where water was blocked from drainage at	Bat species listed with California Department of Fish and Wildlife (CDFW) as Species of Special Concern could potentially occur in the buildings scheduled for demolition. Mitigation to prevent the take of bats shall include the following. a. A qualified wildlife biologist will conduct surveys of the buildings slated for demolition for special-status bats during the appropriate time of day to maximize detectability to determine if bat species are roosting in or near the area no less than 7 days and no more than 14 days prior to beginning demolition. Survey methodology may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (e.g., Anabat, etc.). Visual surveys will include trees within 0.25 mile of Project construction activities. The type of survey will depend on the condition of the potential roosting habitat. If no bat

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>the southwestern corner of the building. Nesting boxes are present in the study area. Homeward Bound staff report that western bluebird and barn owls both use these boxes. The western bluebird is considered a species in decline in California and the west. Raptors are a valuable resource to the State of California, and all raptors are protected under State law. Disturbance to nesting raptors would violate CDFW codes. Impact Evaluation Most of the special status plant species identified in the region require specific micro habitats, such as serpentine soils, saline marsh, or perennial emergent wetlands, which do not occur within the project site. Special status plant species were not observed within the study area. Low quality habitat was observed for one special status species identified by the databases; congested-headed hayfield tarplant (<i>Hemizonia congesta</i> ssp. <i>congesta</i>). This species has been identified in the vicinity of the project site, but it was not observed during the site visit which coincided with the potential blooming period of this species. Special status animals in the region require aquatic habitats, such as bayland salt marsh or riverine systems, which do not</p>	<p>roosts are found, then no further study is required. b. If evidence of bat use is observed, the number and species of bats using the roost will be determined. Bat detectors may be used to supplement survey efforts. c. If roosts are determined to be present and must be removed, the bats will be excluded from the roosting site before the building is removed in coordination with CDFW. A mitigation program addressing compensation, exclusion methods, and roost removal procedures will be developed prior to implementation with communication with CDFW. Exclusion methods may include use of one-way doors at roost entrances (bats may leave, but not re-enter), or sealing roost entrances when the site can be confirmed to contain no bats. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young).</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>exist within the project site. Federally listed special status animal species were not observed within the study area. There are several bat boxes placed within the parcel and these could support several common unlisted bat species. Additionally, Townsend's big-eared bat (<i>Corynorhinus townsendii</i>), and pallid bat (<i>Antrozous pallidus</i>), both CDFW Species of Special Concern, are both known to occur in buildings where they can roost on the walls, ceilings, or in the roof eaves. The buildings in the parcel could potentially support either of these special status bat species. Demolition of the buildings could impact these species, if present at that time. If the existing nesting boxes are to be relocated or removed, this should occur during the non-breeding season. Disturbance to barn owls during the nesting season would not be permitted under CDFW code, and the movement of the nesting boxes while unoccupied would facilitate the continued uninterrupted use of the site by these species. No wetlands were observed at the project site. No portion of the project site is mapped by the National Wetlands Inventory. The</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>project site is not mapped as containing wetlands soils by the Natural Resources Conservation Service. The drainage ditch behind the existing buildings does not meet the criteria for wetlands. In conclusion, There is a potential for commonly occurring and special status bat species to use the buildings in the study area for roosting. No other special status animal species would find suitable habitat for any portion of their lifecycle within the parcel. The presence of graveled and paved surfaces that lack habitat for wildlife severely limits the potential for special status wildlife, as well as species which are more commonly occurring in urban areas.</p>	
Other Factors			

Supporting documentation

- [Climate Change - Additional Discussion.docx](#)
- [BAAQMD 2022a Planning Healthy Places Map 5-31-22.png](#)
- [BAAQMD 2022b Justification Report pdf.pdf](#)
- [JK Botany 2022 Bio Report - Homeward Bound.pdf](#)
- [Miller Pacific 2019 Geotech Report.pdf](#)
- [USA Today 2022 CAs Pioneering Climate Change Plans 9-24-22.pdf](#)
- [Marin IJ 2022a - All Electric Construction Rule Backed 10-19-22.pdf](#)
- [City of Novato 2022 - Parks.pdf](#)
- [WTrans 2022 - Parking Analysis.pdf](#)
- [Walkscore 2022.pdf](#)
- [USEPA 2022 EJScreen run 6-20-22.pdf](#)
- [US Census Bureau 2022 Novato CA Quickfacts.pdf](#)
- [SWITRS Crash Records.csv](#)
- [Our Coast Our Future 2022 Flooding.png](#)

[Our Coast Our Future 2022 Coastal Flooding.png](#)
[OCOFSummaryReport_62ad059a1048c.pdf](#)
[NUSD 2022.pdf](#)
[Novato Zoning Map.pdf](#)
[Novato San Dist 2022.pdf](#)
[Novato Fire District 2022.pdf](#)
[NMWD 2022\(1\).pdf](#)
[NMWD 2022 cont.pdf](#)
[National Park Service 2022.pdf](#)
[MarinMap 2022 - WUI.png](#)
[MarinMap 2022 - Tsunami.pdf](#)
[MarinMap 2022 - Soils.pdf](#)
[MarinMap 2022 - Shake.pdf](#)
[MarinMap 2022 - Parcel Report.pdf](#)
[MarinMap 2022 - liquefaction.pdf](#)
[MarinMap 2022 - Landslides.pdf](#)
[MarinMap 2022 - Geology.pdf](#)
[MarinMap 2022 - Expansive Soil.pdf](#)
[MarinMap 2022 - Elevation.pdf](#)
[MarinMap 2022 - Debris Flow.pdf](#)
[Marin Transit 2022 Service Map.pdf](#)
[Marin Transit 2022 Route 49 Schedule.pdf](#)
[Marin County Haz Solid Waste JPA 2018.pdf](#)
[Marin Airporter 2022.pdf](#)
[Hamilton Local Reuse Authority 1996 - Hamilton Reuse Plan.pdf](#)
[Google Maps 2022 Screenshot - Vintage Oaks.png](#)
[Google Maps 2022 Screenshot - Pacheco Plaza.png](#)
[Google Maps 2022 screenshot - Novato Com Hospital.png](#)
[Google Maps 2022 screenshot - MarinHealth med center.png](#)
[Google Maps 2022 Bike Lanes.png](#)
[FEMA 2022 - Firmette.pdf](#)
[CSW-ST2 2022 Stormwater Control Plan.pdf](#)
[CSW-ST2 2021 PreliminaryHydrologyReport.pdf](#)
[Climate Explorer 2022 - Extreme Heat Days.png](#)
[Climate Explorer 2022 - Avg Daily Max Temp.png](#)
[City of Novato 2022 - Police.pdf](#)
[City of Novato 2020d - General Plan Draft EIR.pdf](#)
[City of Novato 2020b Design Review.pdf](#)
[City of Novato 2020a GeneralPlan2035.pdf](#)
[City of Novato 1996 - Hamilton Field Reuse Plan.pdf](#)
[CGS 2022 - Earthquake Zones of Required Investigation.png](#)
[Assessors Map 157-97.pdf](#)

Additional Studies Performed:

Air Quality: RCH Group, 2022. Air Quality Supporting Information for the Homeward Bound of Marin Project, 826 State Access Road, Novato California. Hydrology and Stormwater: CSW/Stuber-Stroeh Engineering Group, Inc., 2021. Preliminary Hydrology and Hydraulic Analysis for Homeward Bound of Marin Novato, Marin County, California. Updated September 7, 2021 CSW/Stuber-Stroeh Engineering Group, Inc., 2022. Stormwater Control Plan, Hamilton HUD Parcel, A.P.N. 157-970-07, Novato, CA. March 15, 2022. Noise: RCH Group, 2022. Ambient Noise Study & Supporting Information for the Homeward Bound of Marin Project, 826 State Access Road, Novato California. Interior Noise : Illingworth and Rodkin, Inc., 2022. Schematic and Design Level Review, Homeward Bound of Marin, Hamilton HUD Parcel Project, Novato, CA. Report letter addressed to Patrick D. Cousens, Divine Associates Architects, April 125, 2022. Site Contamination Transaction Management Corporation, Inc., 2019. Phase I Environmental Site Assessment Report Homeward Bound of Marin 826 State Access Road Novato, California 94949. February 28, 2019. TMC Project Number: 19-14057.00 Geotechnical Miller Pacific Engineering Group, 2019. Geotechnical Investigation: Homeward Bound Of Marin, 826 State Access Road, Novato, California. Prepared For: Homeward Bound of Marin. July 19, 2019. Project 1986.023 Biological Resources JK Botany & Wetland Science, 2022. Biological Survey of the Homeward Bound Project Site. Prepared for Sicular Environmental Consulting and Natural Lands Management, August 1, 2022. Historic Preservation ESA, 2022a. Confidential Memorandum from Heidi Koenig, ESA Cultural Resources Group to Dan Sicular, Sicular Environmental Consulting, re: Homeward Bound HUD, Novato, Marin County, Archeological Sensitivity Assessment. July 28, 2022 (version in the ERR redacted, as this memo contains sensitive information that must be kept confidential). ESA, 2022b. Confidential Memorandum from Heidi Koenig, ESA Cultural Resources Group to Dan Sicular, Sicular Environmental Consulting, re: Homeward Bound HUD, Novato, Marin County, Cultural Resources Monitoring Plan. September 28, 2022 (version in the ERR redacted, as this memo contains sensitive information that must be kept confidential).

[Miller Pacific 2019 Geotech Report\(1\).pdf](#)

[JK Botany 2022 Bio Report - Homeward Bound\(1\).pdf](#)

[City of Novato 2022 Planning Projects.png](#)

[City of Novato 2022 Novato Village.pdf](#)

[City of Novato 2022 North Bay Childrens Center.pdf](#)

[City of Novato 2022 Hamilton Village.pdf](#)

[City of Novato 2022 Hamilton Square.pdf](#)

[City of Novato 2022 Hamilton Cottages.pdf](#)

[City of Novato 2022 C Street Village.pdf](#)

[CSW-ST2 2022 Stormwater Control Plan\(1\).pdf](#)

[CSW-ST2 2021 PreliminaryHydrologyReport\(1\).pdf](#)

[RCH Group 2022 Ambient Noise Study and Supporting Information\(1\).pdf](#)

[Illingworth and Rodkin 2022 - Interior Noise\(1\).pdf](#)

[RCH Group 2022 Air Quality Supporting Information\(1\).pdf](#)

Field Inspection [Optional]: Date and completed

by:

Dan Sicular

5/25/2022 12:00:00 AM

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[IMG_20220525_114622822_HDR.jpg](#)

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

Websites for City of Novato and other local agencies, as referenced. Steve Marshall, Planning Director, City of Novato Pat D. Cousens, Architect, Fredric C. Divine Associates, Architects

List of Permits Obtained:

Design Review (City of Novato, completed) Building Permit (City of Novato)

Public Outreach [24 CFR 58.43]:

The City of Novato held the following public meetings for the project: Design Review Commission - Public Hearing held January 15, 2020, at City Hall - 901 Sherman Ave Design Review Commission - Workshop, held December 4, 2019 at 7 PM, at City Hall - 901 Sherman Ave Neighborhood Meeting, held November 13, 2019 in the Next Key Center at The Key Room, 1385 Hamilton Parkway, Novato

Cumulative Impact Analysis [24 CFR 58.32]:

The City of Novato Planning Division lists six major development projects, in addition to the current project, within about 1/4 mile of the project site (City of Novato, 2022, Planning Projects). These projects are at various stages of the City's development review process or in the construction phase. These are: Hamilton Village, which is developing 75 residential townhomes on a 4.7 acre previously vacant parcel on the north side of State Access Road, immediately south of the project site. The City of Novato adopted a Mitigated Negative Declaration, pursuant to the California Environmental Quality Act, and approved the project in 2020. The Mitigated Negative Declaration indicates that, with mitigation, the project will not have a significant environmental impact. The project is currently under construction (City of Novato, 2022, Hamilton Village). Novato Village (a.k.a., 801 State Access Senior Apartments) is a 48-unit apartment building for primary occupancy by senior residents aged 55 years

and older. The project is located on a 1.65-acre parcel located just east of the project site. The City of Novato adopted a Mitigated Negative Declaration and approved the project in 2013, and it is now constructed and occupied (City of Novato, 2022, Novato Village). Hamilton Cottages is a senior-oriented housing project on a 1.5-acre, previously vacant site at North Hamilton Parkway and B Street, about 1,000 feet southeast of the project site. It is comprised of 16 single family residential homes. The City of Novato adopted a Mitigated Negative Declaration and approved the project in 2017 or 2018, and the project is now constructed and occupied (City of Novato, 2022, Hamilton Cottages). North Bay Children's Center is proposing to replace their existing 13,055 sf childcare center on a 1.34-acre site located at 932 C Street with a new 19,824 sf single-story childcare center. The City of Novato approved the project, which was exempt from environmental review under CEQA, in 2021 (City of Novato, 2022, North Bay Children's Center). C Street Village is a co-housing development project on a 2.68-acre parcel located at 970 C Street, about 1/4 mile southeast of the project site. The project proposes 42 units and a 3,738 sf common clubhouse. The project will be compared against a Mitigated Negative Declaration previously adopted by the City Council in June 2017 for a prior townhome development proposal at this location. This review will determine the appropriate level of environmental review under the California Environmental Quality Act. The project is currently undergoing design review (City of Novato, 2022, C Street Village). The Hamilton Square project involved the remediation of contaminated soil and the subsequent construction of 31 for-sale townhomes on the site that is now being proposed for development of C Street Village (see above). Remediation activities involved the removal of soil contaminated by the past operation of a Navy gas station. As of November 2018, soil remediation had been completed and all contaminated soil stockpiled at the site has been removed. The developer subsequently withdrew their application and sold the property to a different developer. None of the above projects have been found to have the potential for a significant environmental impact, with the incorporation of specified mitigation measures. These and other projects in the Hamilton Field area are consistent with the Hamilton Reuse Plan, a plan for the redevelopment of the former military base. The Hamilton Reuse Plan envisioned the transformation of the former military base, which included many derelict and defunct buildings and contaminated sites, into a vibrant, healthy, mixed-use community. The current project is also consistent with this vision, the realization of which is a net benefit to the environment. Therefore, no significant cumulative impact is expected.

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

Two alternatives, other than the No Action Alternative, are considered here: the Alternative Site Alternative, and the Reduced Scale Alternative. The Alternative Site Alternative would develop a similar facility to serve homeless veterans and others transitioning out of homelessness, at a different location within Marin County. There are several reasons that this Alternative is rejected: unlike the project site, it would be

unlikely that an alternative site would be in such close proximity to existing housing programs and services, as are provided by Homeward Bound's existing campus. The use of the project site for this project would fulfill the decades-long intentions of the Hamilton Reuse Plan, approved by the City of Novato in 1996, which stipulated that the project site be used for homeless services, including affordable housing, supportive employment, and job training. There are no other comparable sites within Marin County that have been dedicated to this type of use. Purchasing property in Marin County is cost prohibitive, especially for a nonprofit community-based organization such as Homeward Bound. Homeward Bound has a \$1.00, 55-year renewable ground lease for the site secured in 2019 from the City of Novato, an arrangement that would be difficult to replicate elsewhere. Finally, it is unlikely that another site could be secured and developed with so few adverse environmental consequences, and such easy access to transportation, cultural and open space opportunities, commercial services, and other amenities. The Reduced Scale Alternative considers development of a smaller project serving the same uses as the project itself. Under this alternative, about half as many transitional and permanent housing units, that is, about 25, would be developed, along with a smaller job training and events facility. This alternative is rejected because it would not have the beneficial effects of providing housing, job training, and other services to the degree of the project; because it would underutilize the site; and because it would not result in any difference in environmental effects.

No Action Alternative [24 CFR 58.40(e)]

No Action Alternative [24 CFR 58.40(e); 40 CFR 1502.14]: Identify below the "no action" alternative, describing the most likely conditions expected to exist in the future in the absence of the implementation of any action. In the absence of the project, the project site would likely remain vacant for the foreseeable future. This is due to the long-standing commitment of using the project site for homeless, transitional, and job-training uses, which the project is consistent with. The existing former military warehouse buildings would likely remain standing, as they are currently used by the City of Novato for storage. The needs of the homeless population of Marin County, particularly unhoused veterans, would not be met. As the project, as mitigated, would not result in significant adverse environmental impacts, and because the beneficial impacts of the project would not be realized, the No Action Alternative would be a net detriment to the environment, compared to the project, and is rejected.

Summary of Findings and Conclusions:

The project is appropriately sited and designed, and overall will provide a substantial benefit to the community and to future residents with few adverse environmental consequences. There are no available alternatives that would better fulfill the purpose and need of the project, while avoiding or reducing those environmental

consequences. All identified significant environmental effects can be mitigated. With implementation of the specified mitigation measures, the project will have no significant impact.

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
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	Bat species listed with California Department of Fish and Wildlife (CDFW) as Species of Special Concern could potentially occur in the buildings scheduled for demolition. Mitigation to prevent the take of bats shall include the following. a. A qualified wildlife biologist will conduct surveys of the buildings slated for demolition for special-status bats during the appropriate time of day to maximize detectability to determine if bat species are roosting in or near the area no less than 7 days and no more than 14 days prior to beginning demolition. Survey methodology may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (e.g., Anabat, etc.). Visual surveys will include trees within 0.25 mile of Project construction activities. The type of survey will depend on the condition of the potential	N/A		

	<p>roosting habitat. If no bat roosts are found, then no further study is required. b. If evidence of bat use is observed, the number and species of bats using the roost will be determined. Bat detectors may be used to supplement survey efforts. c. If roosts are determined to be present and must be removed, the bats will be excluded from the roosting site before the building is removed in coordination with CDFW. A mitigation program addressing compensation, exclusion methods, and roost removal procedures will be developed prior to implementation with communication with CDFW. Exclusion methods may include use of one-way doors at roost entrances (bats may leave, but not re- enter), or sealing roost entrances when the site can be confirmed to contain no bats. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young).</p>			
<p>Historic Preservation</p>	<p>Implement Cultural Resources Monitoring Plan during project construction</p>	<p>N/A</p>	<p>See Mitigation Plan in the ERR</p>	

Project Mitigation Plan

See Mitigation Plan in the ERR.

[Mitigation Plan - Homeward Bound.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 closest airports are San Rafael Airport, a civilian airport about 3 miles to the south, and Gness Field, also a civilian airport, about 6 miles north of the project site, as shown in the attached map. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Proximity to Airports.jpg](#)

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, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

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:

[FIRMETTE_155c1463-4122-4396-8ca2-e73b932e4429.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

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

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area, as shown on the Firmette map in the ERR. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). 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	100.00	ppm (parts per million)
Ozone	50.00	ppb (parts per million)
Particulate Matter, <2.5 microns	100.00	µg/m3 (micrograms per cubic meter of air)

Provide your source used to determine levels here:

US EPA de minimis table <https://www.epa.gov/general-conformity/de-minimis-tables>. De minimis tables express emissions as tons per year, not ppm, ppb, or g/m3. Figures provided in answers to questions 3 and 4 are tons per year.

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	1.34	ppm (parts per million)
Ozone	1.64	ppb (parts per million)
Particulate Matter, <2.5 microns	0.05	µg/m3 (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 De Minimis Levels Marin County is marginal non-attainment for 8-hour ozone and moderate non-attainment for PM2.5. The San Francisco Bay Area Air Basin is also designated maintenance for CO. The de minimis levels that apply to the Project are 100 tons per year for VOC, NOx, PM2.5 and CO (<https://www.epa.gov/general-conformity/de-minimis-tables>). Project construction would generate a maximum of approximately 0.47 tons per year of VOC, 1.17 tons per year of NOx, 0.05 tons per year of PM2.5, and 1.34 tons per year of CO. Project operation would generate approximately 0.28 tons per year of VOC, 0.18 tons per year of NOx, 0.04 tons per year of PM2.5, and 0.86 tons per year of CO. Thus, Project construction and operation would be below the federal General Conformity de minimis levels pursuant to the 1990 amendments to the Federal Clean Air Act.

Supporting documentation

[RCH Group 2022 Air Quality Supporting Information.pdf](#)

[Memo to RCH - Data Request Response 6-30-22.docx](#)

[Homeward Bound HUD Air-Quality-Worksheet.docx](#)

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

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The San Francisco Bay Conservation and Development Commission (BCDC) has authority under Section 307 of the federal Coastal Zone Management Act (CZMA)(16 U.S.C. section 1456) over federal activities and development projects and non-federal projects that require a federal permit or license or are supported by federal funding and that are within the jurisdictional area of the BCDC, which includes the Bay itself and land within 100 feet of the Bayshore). The project site is not within BCDC jurisdiction. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Coastal Zone Boundary - Marin County.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

[Summary Letter Phase I ESA HUD Parcel.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.

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.

2. Are federally listed species or designated critical habitats present in the action area?

- ✓ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

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

Documentation may include letters from the Services, species lists from the Services’ websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area.

Screen Summary

Compliance Determination

This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area, as discussed in the Biological Resources Survey report in the ERR. See also biologist's site photos in the ERR. This project is in compliance with the Endangered Species Act.

Supporting documentation

[IMG_0153.JPEG](#)

[IMG_0148.JPEG](#)

[IMG_0147.JPEG](#)

[IMG_0145.JPEG](#)

[IMG_0144.JPEG](#)

[IMG_0142.JPEG](#)

[IMG_0141.JPEG](#)

[IMG_0140.JPEG](#)

[IMG_0139.JPEG](#)

[IMG_0137.JPEG](#)

[IMG_0130.JPEG](#)

[IMG_0127.JPEG](#)

[IMG_0126.JPEG](#)

[IMG_0125.JPEG](#)

[IMG_0123.JPEG](#)

[IMG_0122.JPEG](#)

[IMG_0121.JPEG](#)

[JK Botany 2022 Bio SurveyReport - Homeward Bound HUD.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

A windshield survey, search of air photos, and database search revealed seven aboveground storage tanks within 1 mile of the project site. the HUD ASD tool was used to calculate the ASD for the nearest facility with the largest amount of stored flammable material. The project site is well beyond the ASD for this and all of the tanks identified. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements. See documentation in the ERR, including notes of phone conversations with City of Novato and Marin County staff confirming that no other major facilities, such as refineries, tank farms, etc., are within 1 mile of the project site.

Supporting documentation

[Map - Distance to Aboveground Tank.jpg](#)

[Explosive and Flammable Investigation.docx](#)

[Phone Notes- V Damodaran- Novato Planning - 11-3-22.docx](#)

[Phone Notes- M Faryna Marin CUPA 11-4-22.docx](#)

[Chems.xlsx](#)

[Acceptable Separation Distance Tool run 11-4-22.pdf](#)

[Nave Drive Shell Station 6-13-22.jpg](#)

[Ignacio Blvd 76 Station - 6-13-22.jpg](#)

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 is currently developed, is mostly covered with existing buildings and paved areas, does not contain agricultural land, and is not zoned for agriculture. The project site is classified by the California Department of Conservation as Urban and Built-up Land (see map in the ERR).

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

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Screenshot 2022-05-31 at 12-04-21 DLRP Important Farmland Finder.png](#)

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:

[FIRMETTE_155c1463-4122-4396-8ca2-e73b932e4429.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

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

Yes

Screen Summary

Compliance Determination

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

Supporting documentation

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

✓ Advisory Council on Historic Preservation Not Required

✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

✓ Federated Indians of Graton Rancheria Completed

Other Consulting Parties

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

SHPO was consulted due to the age of the existing structures within the project site slated for demolition. Since the project would involve ground disturbance, Tribal Consultation was deemed necessary. Tribal Historic Preservation Officer (THPO) letters were sent to the Tribes listed on the Native American Heritage Commission list in May 2022. The County received a request for consultation from the Federated Indians of Graton Rancheria (FIGR), a federally recognized Native American Tribe that has cultural affiliation with Marin County. The THPO consultation meeting occurred between the County of Marin and FIGR on August 29, 2022. FIGR requested that an archaeological and Tribal monitoring plan be adopted for the project, and Homeward Bound agreed to implement this component working in collaboration with an archaeologist and FIGR. A Cultural Resources Monitoring Plan was drafted by an archaeologist and provided to FIGR for their review and concurrence. The final plan will be incorporated as a mitigation measure for the project.

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:**

The Area of Potential Effect (APE) for the project is the 2.8-acre parcel (APN 157-970-07) itself. See County letter to SHPO.

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
----------------------------------	-----------------------------	------------------	--------------------------

Additional Notes:

The County identified no historic properties within the APE. SHPO concurred with this finding.

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

Yes

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

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. Tribal consultation resulted in the preparation of a Cultural Resources Monitoring Plan. With implementation of this plan, which includes provisions for accidental discovery of archaeological resources, the project will not have a significant impact. Implementation of the plan is included as a mitigation measure. The project is in compliance with Section 106.

Supporting documentation

[Cultural Resources Monitoring Plan 9-28-2022.pdf](#)

[Confidential CR Memo Homeward Bound HUD_07-28-2022 - p 1.pdf](#)

[THPO-Guidiville-Homeward Bound HUD parcel.pdf](#)

[THPO-FIGR-Sarris-Homeward Bound HUD parcel.pdf](#)

[THPO-FIGR-McQuillen-Homeward Bound HUD parcel.pdf](#)

[THPO-FIGR-Buvelot-Homeward Bound HUD parcel.pdf](#)

[email to FIGR THPO 7-6-22 Agenda.pdf](#)

[SHPO Response Homeward Bound HUD parcel.pdf](#)

[Homeward Bound HUD Parcel_SHPOLtr_9-2022.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

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

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: 58

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: 58

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

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was acceptable: 58.0 db. See noise analysis (RCH Group, 2022) in the ERR. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[W-Trans 2015 - Traffic Study Hamilton.pdf](#)
[Illingworth and Rodkin 2022 - Interior Noise.pdf](#)
[City Novato 2020 - Hamilton Village IS MND.pdf](#)
[RCH Group 2022 Ambient Noise Study and Supporting Information.pdf](#)
[Homeward Bound HUD Noise Abatement and Control EA Worksheet.docx](#)

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

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary

Compliance Determination

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[NEPAssist map - WSAs and SSAs in CA.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

Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."

No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

Screen Summary

Compliance Determination

The project will not impact on- or off-site wetlands. There are no NWI wetlands mapped within or adjacent to the project site. See discussion of wetlands in Biological Resources Survey report in the ERR for the Endangered Species section. The project is in compliance with Executive Order 11990.

Supporting documentation

[NEPAssist NWI Wetlands 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

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Screenshot 2022-02-15 CA WSRs.png](#)

[Screenshot 2022-02-15 Wild Scenic River Studies.png](#)

[Screenshot 2022-02-15 Nationwide Rivers Inventory.png](#)

[NEPAssist map - WSAs and SSAs in CA\(1\).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:

See EJ analysis in the EA Factors section.

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

Are formal compliance steps or mitigation required?

Yes

No