

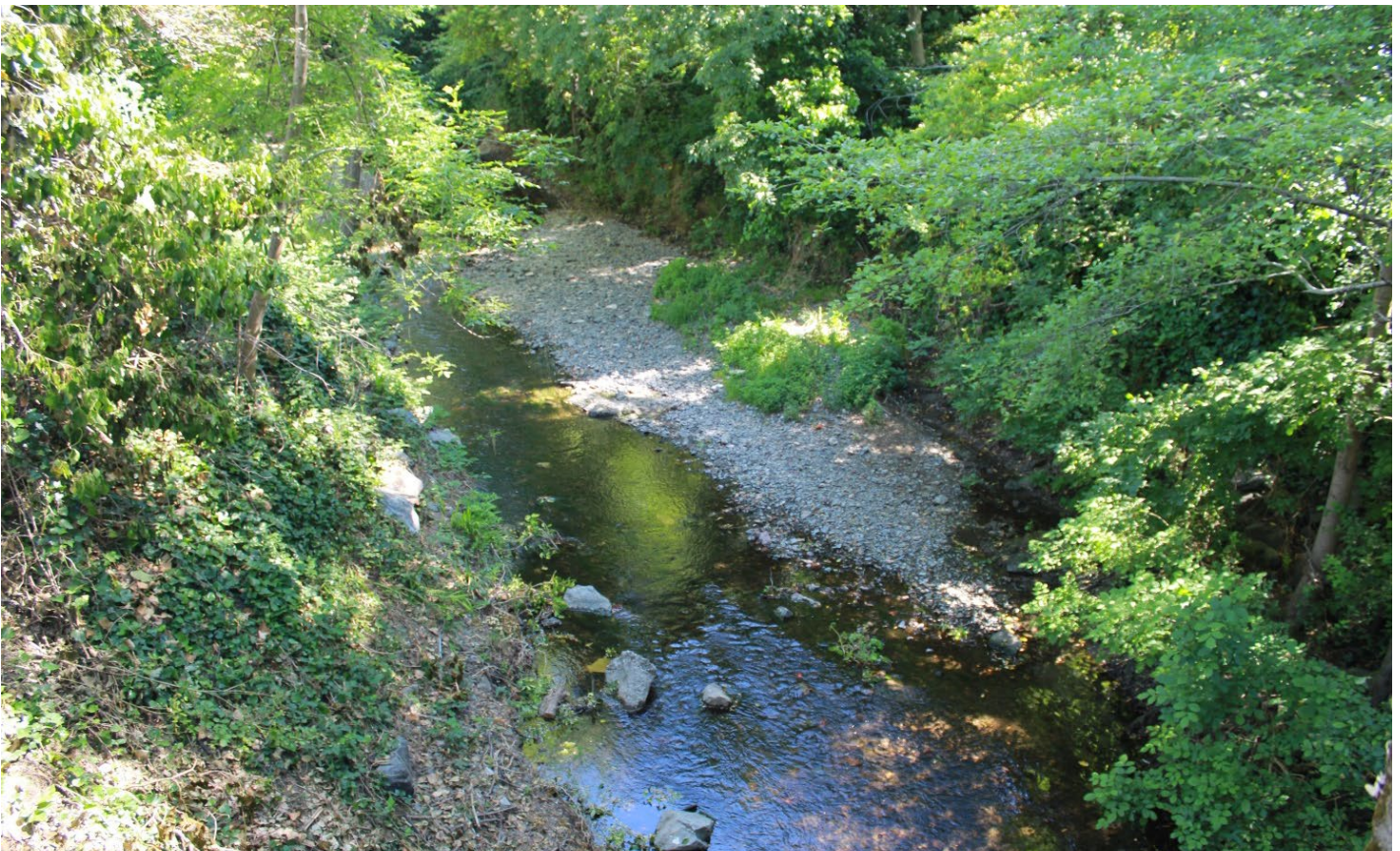
Public Draft

SAN ANSELMO FLOOD RISK REDUCTION PROJECT MITIGATION PLANTING

Addendum to the 2018 San Anselmo Flood Risk Reduction
Project Final Environmental Impact Report (SCH # 2017042041)

Prepared for
Marin County Flood Control and Water
Conservation District

May 2023



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CHAPTER 1

Introduction and Summary

The Marin County Flood Control and Water Conservation District (District) is the Lead Agency, pursuant to the State Guidelines for the California Environmental Quality Act (CEQA), for the preparation of this Addendum to the San Anselmo Flood Risk Reduction Project Final Environmental Impact Report (FEIR; State Clearinghouse No. 2017042041; documents available at <https://marinflooddistrict.org/san-anselmo-flood-risk-reduction-project-documents/>). This Addendum reviews new information pertaining to the San Anselmo Flood Risk Reduction Project (SAFRR project). The District initially approved the SAFRR project, with conditions and after adopting CEQA Findings, in September 2018. This Addendum has been prepared by the County of Marin in accordance with CEQA, the State CEQA Guidelines, and the Marin County Environmental Impact Review Guidelines (Marin County, 1994).

1.1 Project Background

The approved SAFRR project included activities in two locations (refer to FEIR Chapter 3, Project Description). The first was at the former site of the Sunnyside Nursery in unincorporated Marin County, at 3000 Sir Francis Drake Boulevard, where a flood diversion and storage (FDS) basin was proposed at the former Nursery site along Fairfax Creek. At the second location, 634-636 San Anselmo Avenue in downtown San Anselmo along San Anselmo Creek, the SAFRR project would increase creek capacity by removing the “building bridge” that spans San Anselmo Creek and has its foundations in the channel and then regrading and improving the creek channel.

The FEIR identified several potentially significant impacts (summarized in FEIR Chapter 2, Executive Summary, Table 2-1) that could be reduced to less-than-significant with implementation of mitigation measures. Mitigation was adopted as part of the CEQA Findings for impacts related to air quality and greenhouse gas emissions, biological resources, hazards and hazardous materials, hydrology and water quality, parks and recreation, and transportation and circulation.

FEIR Mitigation Measures 4.5-7a: Vegetation Protection for Sensitive Natural Communities, and 4.5-7b: Habitat Restoration and Monitoring Plan, were among the mitigation measures adopted as part of the CEQA Findings and are required to be implemented for the SAFRR project. These mitigation measures require that temporary and permanent impacts on sensitive natural communities, including wetlands and riparian communities, be mitigated by revegetation and restoration on- or offsite at an equal ratio or whatever more stringent requirements are included in the permits issued for the SAFRR project.

Since approval of the project in September 2018, the District secured permits from other agencies, including the San Francisco Bay Regional Water Quality Control Board and California Department of Fish and Wildlife, and proceeded with construction of the following, which are components of the SAFRR project that were evaluated in the FEIR:

- a passive basin at the former Nursery (FDS) site, completed in 2022. The passive basin included completing excavation for the storage basin and perimeter embankments in the upland, the side diversion weir, the outfall pipe into Fairfax Creek and plantings at the site. Phase 1 included work within waters of the U.S./State in Fairfax Creek and removal of select trees within the riparian corridor.
- Removal of the structures on top of the building bridge foundation at 634-636 San Anselmo Avenue, completed in 2021.

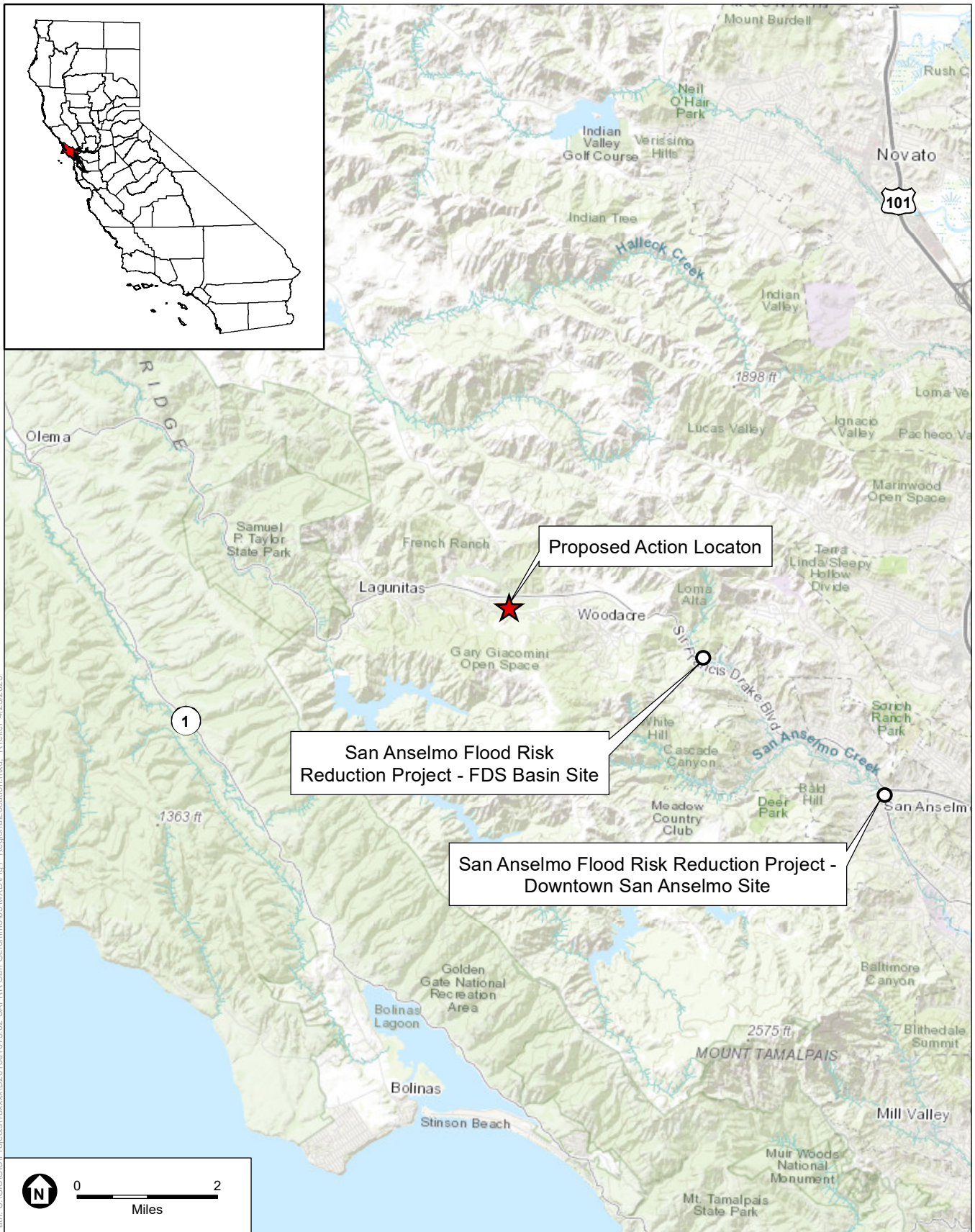
To comply with FEIR Mitigation Measures 4.5-7a and 4.5-7b, and as a condition of the San Francisco Bay Regional Water Quality Control Board (regional board) permit and the California Department of Fish and Wildlife (CDFW) streambed alteration agreement, the SAFRR project is required to implement compensatory mitigation for impacts on waters of the state at the FDS basin.¹

1.2 Summary of Proposed Action

Since approval of the SAFRR project, the District has identified a location for the mitigation planting that is required by the FEIR, the regional board, and CDFW to compensate for impacts of the FDS basin. The location of the proposed mitigation planting site is not within areas previously evaluated in the FEIR. The mitigation planting is the “proposed action” that is subject of this Addendum.

The proposed action is located along San Geronimo Creek west of Woodacre, shown on **Figure 1**. Components of the SAFRR project evaluated in the FEIR are located in unincorporated Marin County along Fairfax Creek, and in downtown San Anselmo, also shown on Figure 1. The proposed action is approximately 3 miles west of the FDS basin site.

¹ San Francisco Bay Regional Water Quality Control Board, Clean Water Act Section 401 Water Quality Certification and Order for San Anselmo Flood Risk Reduction Project, Marin County, Condition 15. February 7, 2022; California Department of Fish and Wildlife, Final Lake or Streambed Alteration Agreement, Notification No. 1600-2020-0146-R3, San Anselmo Flood Risk Reduction Project, October 1, 2021.



SOURCE: USGS; ESA, 2020

SAFRR Designs and Environmental Permitting

Figure 1
Regional Location



1.3 Supplemental Environmental Review of the Proposed Action

Pursuant to Section 15164 of the State CEQA *Guidelines*, the lead agency shall prepare an addendum to a previously certified EIR if some changes or additions to the environmental evaluation are necessary but if none of the conditions described in Section 15162 or 15163 calling for preparation of a subsequent or supplemental EIR have occurred. State CEQA *Guidelines* Section 15162 lists the following conditions, which require preparation of a subsequent or supplemental EIR:

- 1) Substantial changes are proposed in the project which will require major revisions to the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the EIR;
 - (B) Significant effects previously examined will be substantially more severe than shown;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The District has conducted a CEQA review of the proposed action in the form of a Supplemental Environmental Review Checklist (Chapter 3), and has found that the proposed action would not meet any of the conditions in State CEQA Guidelines Section 15162 (Chapter 4): the proposed action, in combination with changed conditions, would not result in new or substantially more severe significant environmental effects requiring changes to the impact conclusions in the FEIR. Therefore, an addendum is warranted, and neither a subsequent EIR, not a supplemental EIR (pursuant to State CEQA *Guidelines* Section 15163), is required.

1.4 Review and Comment

CEQA does not require a formal public review and comment period on an EIR Addendum. However, the FEIR and this EIR Addendum are available for review during the hours of 8:00 am to 4:00 pm, Monday through Thursday and 8:00 am to noon on Friday at the Marin County Community Development Agency at 3501 Civic Center Drive, Room 308, San Rafael, CA 94903, and on the Community Development Agency's website at <https://marinflooddistrict.org/san-anselmo-flood-risk-reduction-project-documents/>. Those wishing to submit comments on this Addendum may do so in writing. Please address your comments to:

Ms. Rachel Reid
Environmental Planning Manager
Marin County Community Development Agency
3501 Civic Center Drive, Room 308
San Rafael, CA 94903
Envplanning@marincounty.org

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CHAPTER 2

Proposed Action

2.1 Introduction

At a site near Woodacre on San Geronimo Creek, the Marin County Flood Control and Water Conservation District (District) proposes to implement compensatory mitigation required to offset impacts caused by construction of the SAFRR project’s FDS basin. The location of the proposed mitigation planting site is not within geographic areas previously evaluated in the FEIR. The mitigation planting is the “proposed action” that is subject of this Addendum.

This chapter includes a brief description of the site of the proposed action and details of the mitigation requirements specified in the FEIR and other permits. It then provides a summary of the mitigation planting, which is the proposed action. The chapter concludes with an explanation of the environmental setting (the “baseline”) for the supplemental environmental review, the scope of the review, and a list of the approvals necessary for the proposed action to proceed.

2.2 Summary and Background

The approved SAFRR project included activities in two locations (refer to FEIR Chapter 3, Project Description). The first was at the former site of the Sunnyside Nursery in unincorporated Marin County, adjacent to the western border of the Town of Fairfax, where a flood diversion and storage (FDS) basin was proposed at the former Nursery site along Fairfax Creek. At the second location, 634-636 San Anselmo Avenue in downtown San Anselmo along San Anselmo Creek, the SAFRR project would increase creek capacity by removing the “building bridge” that spans San Anselmo Creek and has its foundations in the channel and then regrading and improving the creek channel.

The FEIR identified several potentially significant impacts of the SAFRR project (summarized in FEIR Chapter 2, Executive Summary, Table 2-1) that could be reduced to less-than-significant with implementation of mitigation measures. Mitigation was adopted as part of the CEQA Findings for impacts related to air quality and greenhouse gas emissions, biological resources, hazards and hazardous materials, hydrology and water quality, parks and recreation, and transportation and circulation.

FEIR Mitigation Measures 4.5-7a: Vegetation Protection for Sensitive Natural Communities, and 4.5-7b: Habitat Restoration and Monitoring Plan, included below, were among the mitigation measures adopted as part of the CEQA Findings and are required to be implemented for the SAFRR project. These mitigation measures require that temporary and permanent impacts on

sensitive natural communities, including wetlands and riparian communities, be mitigated by revegetation and restoration on- or offsite at an equal ratio or whatever more stringent requirements are included in the permits issued for the SAFRR project.

Mitigation Measure 4.5-7a: Vegetation Protection for Sensitive Natural Communities.

Prior to start of construction of any Project element, the extent of sensitive natural communities within the work area shall be identified by a qualified biologist experienced in the definition and recognition of these communities. The area of impact in sensitive natural communities shall be minimized by siting construction staging and access areas outside the limits of riparian and oak woodland vegetation (as determined during pre-construction surveys) and by utilizing previously-disturbed areas. Before construction begins, the Project engineer and a qualified biologist shall identify locations for equipment and personnel access and materials staging that will minimize riparian vegetation disturbance. When heavy equipment is required, unintentional soil compaction shall be minimized by using equipment with a greater reach, or using low-pressure equipment. Temporary impacts on sensitive natural communities shall be mitigated by revegetation with native species, as required by Mitigation Measure 4.5-7b.

Mitigation Measure 4.5-7b: Habitat Restoration and Monitoring Plan.

The Flood Control District shall prepare a Habitat Restoration and Monitoring Plan for restoration following construction activities at both Project sites. The plan shall describe required salvage and replanting protocols prior to and after construction is complete and shall thereby reduce the long-term amount of losses of these natural communities. This plan shall include, but not be limited to, protocols for replanting of vegetation removed prior to or during construction, and management and monitoring of the plants to ensure replanting success pursuant to Marin County's Countywide Plan, Marin County Code, or Code requirements of the Town of San Anselmo, or by any more stringent requirements included in other permits issued for the Project.

The plan shall specify monitoring and performance criteria for the species planted, invasive species control criteria, as well as the best time of year for seeding to occur, pursuant to requirements of permits from the various resource agencies with regulatory purview over the Project. Revegetated areas shall be monitored for a five-year period to track progress toward performance criteria.

Native riparian vegetation within the Project sites shall be salvaged prior to construction and replanted after construction is completed. Areas impacted by construction-related activity shall be replanted or reseeded with native trees, shrubs, and herbaceous perennials and annuals from the watershed under guidance from a qualified biologist. Local plant materials shall be used for revegetation of the disturbed area. The plant materials shall include local cuttings from the local watershed or from adjacent watersheds. This shall ensure that the seeds can be collected during the appropriate season and the container plants shall be of an appropriate size for out-planting. Using local cuttings can reduce the length of this phase.

The Habitat Restoration and Monitoring Plan shall also address restoration of jurisdictional wetlands and waters. Temporary impacts to wetlands shall be restored onsite with native wetland species under guidance from a qualified biologist. Permanent impacts to jurisdictional wetlands shall be mitigated for by replacement on- or off-site at

an equal ratio or whatever more stringent requirements are included in the permits to be issued for the Project.

The monitoring plan shall include annual monitoring of restored areas for at least 5 years. The plan shall contain vegetation management protocols, protocols for monitoring replanting success, and an adaptive management plan if success criteria are not being met. The adaptive management plan would include interim thresholds for replanting success and alternative management approaches, such as weed control or additional replanting, to undertake if thresholds are not met.

Since approval, the District secured required permits from other agencies, including the San Francisco Bay Regional Water Quality Control Board and California Department of Fish and Wildlife. Impacts to waters of the state are summarized in the regional board permit as follows:

If effective best management practices (BMPs) are not implemented during construction, waters of the state may be impacted by increased erosion and sedimentation, and/or discharging debris and other waste materials. The Project will impact a total of 1 acre (1,629 LF) of waters of the State, 0.27 (267 LF) acres of which are permanent fill impacts. Of that total, impacts to Fairfax Creek at Project Location 1 [the FDS basin] include 0.24 acres (195 LF) of permanent fill impact and 0.61 acres (1,160 LF) of temporary impacts. Impacts to San Anselmo Creek at Project Location 2 [634-636 San Anselmo Avenue] include 0.03 acres (72 LF) of permanent fill impacts and 0.13 acres (202 LF) of temporary impacts. To complete the Project, 34 existing riparian trees will be removed from the riparian corridor.

The regional board required the District to identify areas of proposed creation, restoration, and/or enhancement of waters of the State to compensate for the SAFRR project's remaining permanent impacts at a 2:1 mitigation ratio. The regional board also required that 231 replacement tree plantings be planted as mitigation for riparian tree removals within riparian habitat adjacent to a stream.

The CDFW Streambed Alteration Agreement required that a minimum of 0.76 acre and 756 linear feet of open water and riparian habitat, including 0.10 acre and 90 linear feet of restoration at the Downtown San Anselmo site (634-636 San Anselmo Avenue), be restored or enhanced to provide compensatory mitigation for permanent impacts to 0.27 acre and 267 linear feet of open water and riparian habitat.²

A passive FDS basin (regional board permit's "Project Location 1") was completed in 2022. The passive basin included completing excavation for the storage basin and perimeter embankments in the upland, the side diversion weir, the outfall pipe into Fairfax Creek and plantings at the site. Phase 1 included work within waters of the U.S./State in Fairfax Creek and removal of select trees within the riparian corridor. The FDS Basin included the creation of 0.39 acres (323 LF) of aquatic habitat, which offset part of the total minimum of 0.76 acre of aquatic and riparian habitat restoration or enhancement required by the CDFW.

² California Department of Fish and Wildlife, Final Lake or Streambed Alteration Agreement, Notification No. 1600-2020-0146-R3, San Anselmo Flood Risk Reduction Project, October 1, 2021.

In 2022, the District in coordination with a nongovernmental landowner identified a potential location for the compensatory mitigation planting required by the FEIR and other agency permits. As described below, the proposed action (mitigation planting) would create 0.36 acre of riparian habitat along San Geronimo Creek to compensate for the SAFRR project's permanent impacts on open water and riparian habitat.

2.3 Location and Setting

The proposed action is located in the southwestern portion of Assessor's Parcel 172-372-14, in unincorporated Marin County west of San Geronimo (**Figure 2**). The site of the proposed action is accessed from San Geronimo Valley Drive between Sir Francis Drake Boulevard and Deer Camp Drive. San Geronimo Creek traverses the parcel to the north of the site. The site parcel is zoned for Resort and Commercial Recreation and operated as a golf course until 2017. In 2018 the site was sold, and in 2021 construction of a fish passage and off-channel habitat restoration project was completed in and along San Geronimo Creek near the proposed action (shown on **Figure 3**).³ The landscape adjacent to the site is an open meadow with existing walking paths (former golf course cart paths).

Surrounding land uses include single family residences to the south and west, recreational and open space areas to the north across Sir Francis Drake Boulevard, and the San Geronimo Treatment Plant to the east.

The proposed action is near the geographic center of Marin County, approximately equidistant from San Francisco Bay and the Pacific Ocean. The hills surrounding San Geronimo Valley are generally protected or private open space; sparse development fills remaining areas of the valley. San Geronimo Creek is tributary to Lagunitas Creek, and within the Lagunitas Creek watershed.

The proposed action would implement a mitigation planting along or near the top of bank on the southern side of San Geronimo Creek. The two locations where planting would occur at the site are approximately 350 feet apart. The planting locations are adjacent to existing trees and open fields.

2.4 Proposed Action Description

The purpose of the proposed mitigation planting is to provide a minimum of 0.33 acre off-site mitigation area to offset impacts to riparian habitat associated with the District's SAFRR Project. The primary objectives of the proposed action are to: 1) convert existing grassland areas to riparian habitat adjacent to San Geronimo Creek, 2) expand and enhance the existing riparian corridor, and 3) create upland habitat in support of the FEIR and requirements.

³ The 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit removed infrastructure comprising of Roy's Pools fish ladder and sheet metal weirs and created a new channel gradient with engineered streambed materials to allow fish passage and hydraulic connectivity along San Geronimo Creek. The project also removed trees and replaced a failing pedestrian bridge in the same location, and created floodplain and off-channel habitat through grading of adjacent land surfaces followed by revegetating disturbed areas with native seeds, plants and trees.



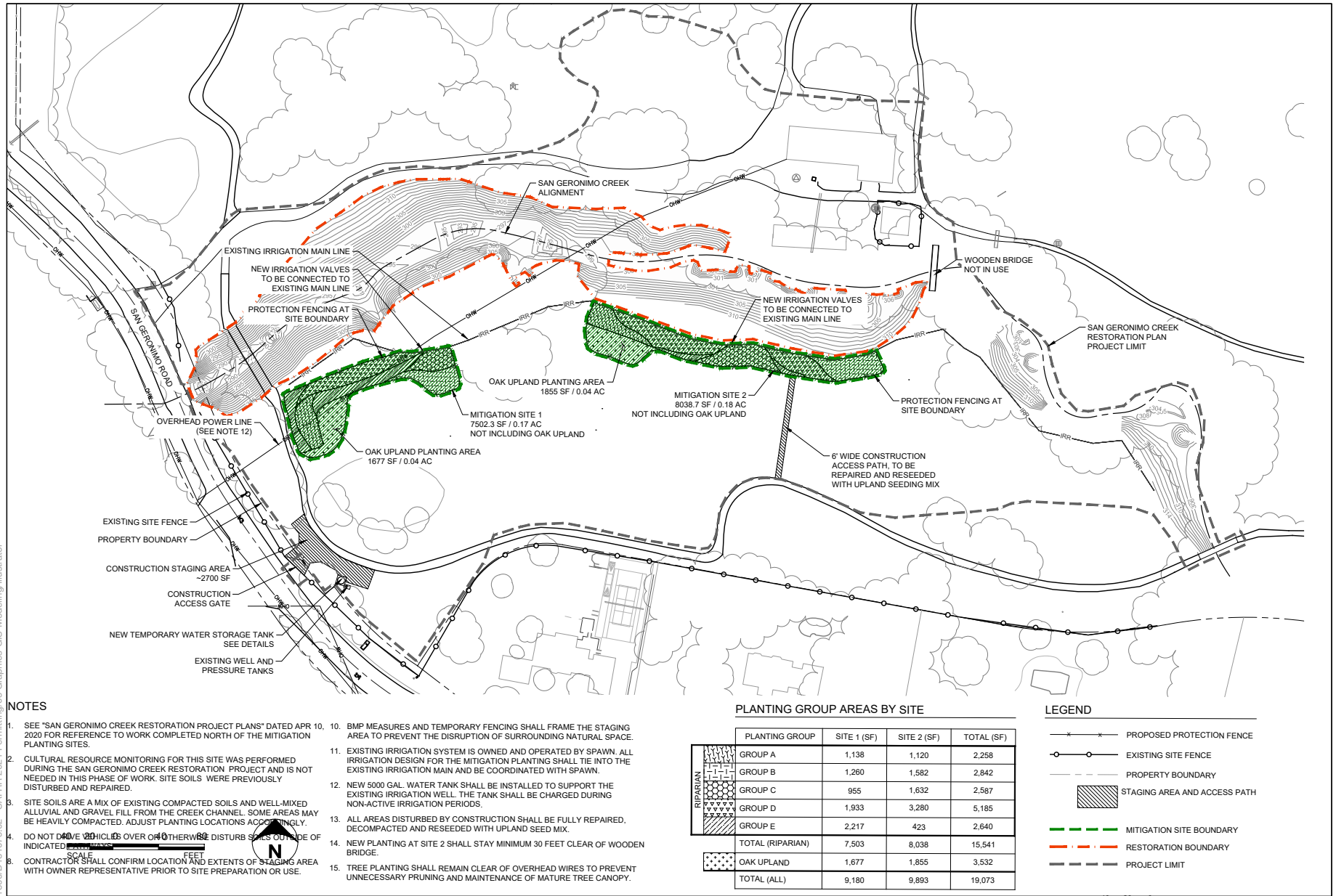
SOURCE: ESA, 2022

SAFRR Designs and Environmental Permitting

Figure 2
Project Area



1800D161075-02 - SAFRR 2021 Permitting/05 Graphics-GIS-Modeling/Illustrator



NOTES

- SEE "SAN GERONIMO CREEK RESTORATION PROJECT PLANS" DATED APR 10, 2020 FOR REFERENCE TO WORK COMPLETED NORTH OF THE MITIGATION PLANTING SITES.
- CULTURAL RESOURCE MONITORING FOR THIS SITE WAS PERFORMED DURING THE SAN GERONIMO CREEK RESTORATION PROJECT AND IS NOT NEEDED IN THIS PHASE OF WORK. SITE SOILS WERE PREVIOUSLY DISTURBED AND REPAIRED.
- SITE SOILS ARE A MIX OF EXISTING COMPACTED SOILS AND WELL-MIXED ALLUVIAL AND GRAVEL FILL FROM THE CREEK CHANNEL. SOME AREAS MAY BE HEAVILY COMPACTED. ADJUST PLANTING LOCATIONS ACCORDINGLY.
- DO NOT DRIVE VEHICLES OVER OR OTHERWISE DISTURB SOILS OUTSIDE OF INDICATED STAGING AREAS.
- CONTRACTOR SHALL CONFIRM LOCATION AND EXTENTS OF STAGING AREA WITH OWNER REPRESENTATIVE PRIOR TO SITE PREPARATION OR USE.
- BMP MEASURES AND TEMPORARY FENCING SHALL FRAME THE STAGING AREA TO PREVENT THE DISRUPTION OF SURROUNDING NATURAL SPACE.
- EXISTING IRRIGATION SYSTEM IS OWNED AND OPERATED BY SPAWN. ALL IRRIGATION DESIGN FOR THE MITIGATION PLANTING SHALL TIE INTO THE EXISTING IRRIGATION MAIN AND BE COORDINATED WITH SPAWN.
- NEW 5000 GAL. WATER TANK SHALL BE INSTALLED TO SUPPORT THE EXISTING IRRIGATION WELL. THE TANK SHALL BE CHARGED DURING NON-ACTIVE IRRIGATION PERIODS.
- ALL AREAS DISTURBED BY CONSTRUCTION SHALL BE FULLY REPAIRED, DECOMPACTED AND RESEDED WITH UPLAND SEED MIX.
- NEW PLANTING AT SITE 2 SHALL STAY MINIMUM 30 FEET CLEAR OF WOODEN BRIDGE.
- TREE PLANTING SHALL REMAIN CLEAR OF OVERHEAD WIRES TO PREVENT UNNECESSARY PRUNING AND MAINTENANCE OF MATURE TREE CANOPY.

PLANTING GROUP AREAS BY SITE

	PLANTING GROUP	SITE 1 (SF)	SITE 2 (SF)	TOTAL (SF)
RIPARIAN	GROUP A	1,138	1,120	2,258
	GROUP B	1,260	1,582	2,842
	GROUP C	955	1,632	2,587
	GROUP D	1,933	3,280	5,185
	GROUP E	2,217	423	2,640
	TOTAL (RIPARIAN)	7,503	8,038	15,541
	OAK UPLAND	1,677	1,855	3,532
	TOTAL (ALL)	9,180	9,893	19,073

LEGEND

- x — x — PROPOSED PROTECTION FENCE
- o — o — EXISTING SITE FENCE
- - - - - PROPERTY BOUNDARY
- ▨ STAGING AREA AND ACCESS PATH
- — — — — MITIGATION SITE BOUNDARY
- - - - - RESTORATION BOUNDARY
- - - - - PROJECT LIMIT

SOURCE: ESA, 2022

SAFRR Designs and Environmental Permitting

Figure 3
Mitigation Planting Plan



The mitigation planting would convert existing areas of open grassland to riparian habitat adjacent to San Geronimo Creek. The mitigation planting area is shown on Figure 2. The existing grassland would be converted to riparian habitat (0.36 acres) plus an additional upland habitat of oak grassland (0.08 acres) by planting approximately 1,700 native plants and trees over two distinct sites totaling 0.44 acre. An upland seeding mix with native grasses and wildflowers would be used to repair and replace in-kind all areas disturbed by construction.

The mitigation planting includes activities at two distinct areas that would receive plantings of riparian trees, shrub and herbaceous species, shown on Figure 3. The two areas are organized into five groups (A-E) based on general species associations and horticultural requirements. An additional distinct planting group – Oak Knoll – would be established adjacent to the areas.

The mitigation planting areas would be planted adjacent to the riparian zone and would include a variety of riparian species such as valley oak (*Quercus lobata*), coast live oak (*Quercus agrifolia*), buckeye (*Aesculus californica*), bigleaf maple (*Acer macrophyllum*), California mugwort (*Artemisia douglasiana*), California blackberry (*Rubus ursinus*), Hedgenettle (*Stachys ajugoides*) and California wild rose (*Rosa californica*). The provisional plant list is provided in the *Mitigation Planting Project – San Geronimo Commons* plan set (ESA, December 2022).

A temporary irrigation system would be installed and maintained over a period of three to five years to support successful establishment of the native riparian plantings. The irrigation system would consist of valves and hoses connected to an existing irrigation main line, along with the temporary 5,000-gallon water storage tank. Water for irrigation would be sourced from an existing active groundwater well and groundwater pumping rates would not increase.

2.5 Construction Activities

Table 1 summarizes construction activities proposed for the mitigation planting. As shown, the overall duration for the mitigation planting would be six weeks. During this period the sites would be prepared, plants would be installed, and the sites would be stabilized. The mitigation planting areas are both within areas disturbed for site access in 2020 and 2021 for the 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit.⁴

During the site preparation work, limited plant material including non-native plant species (such as Italian thistle (*Carduus pycnocephalus*), Harding grass (*Phalaris aquatica*), common wild oat (*Avena* spp.)) would be removed and later replaced with native riparian vegetation. Controlled temporary access routes in and out of the project site would be designated and established to support light vehicle/crew truck traffic, material supply and crew activities. A staging area and temporary 5,000-gallon water storage tank would be installed as shown on Figure 3.

⁴ The 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit removed infrastructure comprising of Roy's Pools fish ladder and sheet metal weirs and created a new channel gradient with engineered streambed materials to allow fish passage and hydraulic connectivity through the project area. The project also removed trees and replaced a failing pedestrian bridge in the same location, and created floodplain and off-channel habitat through grading of adjacent land surfaces followed by revegetating disturbed areas with native seeds, plants and trees.

**TABLE 1
CONSTRUCTION ACTIVITIES FOR PROPOSED MITIGATION PLANTING**

Location	Construction Activity	Planted Area/ Impacted Area	Total Plants (Est)	Construction Duration
GENERAL: SAN GERONIMO COMMONS MITIGATION PLANTING				
Site 1	<ul style="list-style-type: none"> Install temporary water tank (5,000 gallon) with gravel pad Install temporary irrigation 	2,000 square feet	N/A	6 weeks
Site 2	<ul style="list-style-type: none"> Install designated access routes Install temporary irrigation 	2,000 square feet	N/A	6 weeks
SITE 1: SAN GERONIMO COMMONS MITIGATION PLANTING				
Group A	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant riparian vegetation 	<u>Planted Area:</u> 1,138 square feet <u>Total Footprint:</u> 0.025 acres	309	6 weeks
Group B	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant riparian vegetation 	<u>Planted Area:</u> 1,260 square feet <u>Total Footprint:</u> 0.031 acres	66	6 weeks
Group C	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant riparian vegetation 	<u>Planted Area:</u> 955 square feet <u>Total Footprint:</u> 0.022 acres	78	6 weeks
Group D	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant Riparian vegetation 	<u>Planted Area:</u> 1,934 square feet <u>Total Footprint:</u> 0.045 acres	47	6 weeks
Group E	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant riparian vegetation 	<u>Planted Area:</u> 2,217 square feet <u>Total Footprint:</u> 0.05 acres	457	6 weeks
Oak Knoll	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant vegetation 	<u>Planted Area:</u> 1,677 square feet <u>Total Footprint:</u> 0.038 acres	17	6 weeks
SITE 2: SAN GERONIMO COMMONS MITIGATION PLANTING				
Group A	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant riparian vegetation 	<u>Planted Area:</u> 1,121 square feet <u>Total Footprint:</u> 0.025 acres	305	6 weeks
Group B	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant riparian vegetation 	<u>Planted Area:</u> 1,582 square feet <u>Total Footprint:</u> 0.039 acres	82	6 weeks
Group C	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant riparian vegetation 	<u>Planted Area:</u> 1,633 square feet <u>Total Footprint:</u> 0.038 acres	133	6 weeks
Group D	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant Riparian vegetation 	<u>Planted Area:</u> 3,280 square feet <u>Total Footprint:</u> 0.067 acres	80	6 weeks

TABLE 1 (CONTINUED)
CONSTRUCTION ACTIVITIES FOR PROPOSED MITIGATION PLANTING

Location	Construction Activity	Planted Area/ Impacted Area	Total Plants (Est)	Construction Duration
SITE 2: SAN GERONIMO COMMONS MITIGATION PLANTING (cont.)				
Group E	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant riparian vegetation 	<u>Planted Area:</u> 423 square feet <u>Total Footprint:</u> 0.01 acres	87	6 weeks
Oak Knoll	<ul style="list-style-type: none"> Remove invasive plant species 0 trees removed Plant trees Plant vegetation 	<u>Planted Area:</u> 1,855 square feet <u>Total Footprint:</u> 0.042 acres	19	6 weeks

Existing grassland areas at the site would not be disturbed except for specific locations for installation of each tree or plant. Excavation of planting holes between 6 inches and 24 inches deep, large enough to receive plant rootball, would be required to install the specified plants and trees. No trees would be removed from either of the two mitigation planting areas as a result of the proposed action.

Plantings and associated project elements such as a temporary irrigation system would be accomplished by a labor crew using hand tools to prepare discrete planting locations for each plant within each site. Specified trees and plants would be installed by labor crews accessing the sites on foot. The mitigation planting would not require earthwork and/or involve significant site disturbance. All spoils generated from the installation of trees and plants would be distributed and spread uniformly over each of the two sites.

Implementation of the mitigation planting including the installation of a staging area, temporary access routes and the 5,000-gallon water tank would involve bobcats (loaders), flat bed truck with boom, forklifts, quad or ATV vehicles, crew trucks and trailers combined with labor forces using hand tools and light mechanical equipment. Materials related to the planting project including container plants, browse control, shade structures over 20 percent of plants, erosion control and irrigation system materials would be delivered and transported to the two sites by light vehicles such as a bobcat or crew truck and trailer. The mitigation planting areas would have temporary protection fencing consisting of t-posts with rope to clearly distinguish the mitigation planting areas from other restoration areas. Once the mitigation area has been signed off by both regulatory agencies, the temporary fence would be removed.

During construction, disturbed areas would be protected with specified erosion control measures (e.g., jute, straw, coconut fiber erosion control fabric, coir logs, straw, silt fencing, etc.) throughout the staging areas and planting sites. After construction, all construction-disturbed areas would be seeded with a mix of native grasses and wildflowers.

2.6 Scope of the Environmental Review

The supplemental environmental review compares the proposed action to the baseline to determine whether the proposed action would result in new or substantially more severe significant impacts than identified in the FEIR.

The supplemental environmental review includes the full range of environmental topics required under CEQA. This includes a consideration of whether the proposed action would make a considerable contribution to any identified cumulative impacts. Per State CEQA Guidelines §15355, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment which results from the incremental impact of a project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The supplemental environmental review will determine whether any incremental impacts from the proposed action “when added to other closely related past, present and reasonably foreseeable probable future projects” are cumulatively considerable.

2.7 Required Approvals

Following adoption of this FEIR addendum, proposed action approval would require the following:

- Approval of an agreement between the Trust for Public Land (property owner) and District to implement the mitigation planting.

CHAPTER 3

Environmental Checklist for Supplemental Environmental Review

The purpose of this checklist is to evaluate the proposed action (mitigation planting) in order to determine, for each environmental resource area, whether any “changed condition” (i.e., changed circumstances, Project changes, or new information of substantial importance) may result in a new or substantially more severe environmental impact. A “no” answer does not necessarily mean that there are no potential impacts relative to that environmental area, but that there is no change in the condition or status of the impact since it was analyzed and addressed (with or without mitigation) in the prior FEIR. Accordingly, the answer in the checklist may be “no” if the Project does not involve changes that would result in a modification to the conclusion of the prior environmental documents with regard to that particular impact.

3.1 Explanation of Checklist Evaluation Categories

3.1.1 Where Impact was Analyzed

The first column in the checklist, “where impact was analyzed,” provides a cross-reference to the particular FEIR document and impact number, section, or pages in which information and analysis that pertain to the environmental issue listed under each topic may be found. The FEIR consists of the following documents:

- San Anselmo Flood Risk Reduction Project Final Environmental Impact Report Volume 1: Revisions to the Draft Environmental Impact Report, August 2018
- San Anselmo Flood Risk Reduction Project Final Environmental Impact Report Volume 2: Response to Comments, August 2018
- San Anselmo Flood Risk Reduction Project Errata to the Final EIR, September 2018

3.1.2 Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?

Pursuant to Section 15162(a)(1) of the State CEQA Guidelines, this checklist column indicates whether substantial changes are proposed in the Project which will require major revisions of the 2018 FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

State CEQA Guidelines Section 15064(d) provides guidance on determining the significance of environmental effects:

- (d) In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.
 - (1) A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project. Examples of direct physical changes in the environment are the dust, noise, and traffic of heavy equipment that would result from construction of a sewage treatment plant and possible odors from operation of the plant.
 - (2) An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment. For example, the construction of a new sewage treatment plant may facilitate population growth in the service area due to the increase in sewage treatment capacity and may lead to an increase in air pollution.
 - (3) An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.

3.1.3 Do Any New Circumstances Involve New or Substantially More Severe Impacts?

Pursuant to Section 15162(a)(2) of the State CEQA Guidelines, this checklist column indicates whether there have been circumstances under which the Project is undertaken (e.g., changes to the Project site or the vicinity) that have occurred subsequent to the prior FEIR, which would result in the current Project having new significant environmental impacts that were not considered in the FEIR or which would substantially increase the severity of a previously identified significant impact. New circumstances may include, for example, changes to the regulatory or environmental setting, that is, the legal or physical context for the Project, that may lead to a conclusion that a new or substantially more severe significant impact would now occur, compared to the FEIR.

3.1.4 Any New Information of Substantial Importance Requiring New Analysis or Verification?

Pursuant to Section 15162(a)(3)(A-D) of the State CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous FEIR was certified as complete is available requiring an update to the analysis of the previous FEIR to verify that the environmental conclusions remain valid.

If the additional analysis in this supplemental environmental review shows any of the following, then this question is answered “Yes:” (A) the Project would have one or more significant effects

not discussed in the FEIR; or (B) significant effects previously examined would be substantially more severe than shown in the FEIR; or (C) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects on the Project, but the Project proponents decline to adopt the mitigation measure or alternative; or (D) mitigation measures or alternatives which are considerably different from those analyzed in the FEIR would substantially reduce one or more significant effects on the environment, but the Project proponents decline to adopt the mitigation measure or alternative.

3.1.5 Do Existing FEIR Mitigation Measures Reduce Impacts to a Less-Than-Significant Level?

This question applies if answering any of the three previous questions indicates that the proposed Project could result in a new or substantially more severe significant impact. Pursuant to Section 15162(a)(3) of the State CEQA Guidelines, this column indicates whether the prior FEIR identifies feasible mitigation measures to avoid or minimize the significant impacts of the proposed Project. In most cases, the mitigation measures that were identified in the FEIR were adopted, made conditions of Project approval, and have already been implemented. A “yes” response is provided if previously adopted mitigation measures would effectively reduce new or more severe impacts of the current Project. A “no” response would indicate that previously adopted measures are insufficient to reduce new or more severe impacts. If “NA” is indicated, this Supplemental Environmental Review concludes that the impact does not occur with this Project and therefore no mitigation is needed.

3.2 Explanation of Discussion and Mitigation Sections

3.2.1 Discussion

A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. This includes a discussion of any changes to the environmental and regulatory setting for the Project, and a discussion of Project impacts. The discussion provides information about the particular environmental issue, how the Project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

3.2.2 Mitigation Measures

Applicable mitigation measures from the prior environmental review that are required to reduce or avoid impacts of the current Project are listed under each environmental category. New mitigation measures are included, if needed. The final text of the mitigation measures from the FEIR is included in the “Mitigation Measures” section of each checklist item. In one instance, revisions to previously adopted mitigation measures are provided. Revisions are for clarity, for consistency with current regulations, or to make them applicable to the current Project. All revisions to mitigation measures are also compiled in Chapter 4. Revisions are indicated by ~~strikethrough~~ and underline text.

3.2.3 Conclusions

A discussion of the conclusion relating to the analysis contained in each section.

3.3 Environmental Checklist

3.3.1 Aesthetics

Environmental Issue Area	Where Impact Was Analyzed in FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/ Resolve Impacts?
1. Aesthetics. Would the Project:					
a. Have a substantial adverse effect on a scenic vista?	p. 4.2-10	No	No	No	N/A
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	p. 4.2-15	No	No	No	N/A
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	p. 4.2-17	No	No	No	N/A
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	p. 4.2-19	No	No	No	N/A

Findings of FEIR

The FEIR determined that the approved SAFRR project would not result in substantial impacts to aesthetics and visual resources because (a) construction and operation and maintenance activities would be limited in physical scale, when observed within the context of the broader, distant scenic vistas, (b) the constructed SAFRR project would be similar to its present conditions and appearance of the landscape would not be substantially altered, and (c) the SAFRR project would not adversely affect day or nighttime views in the area. Therefore, the FEIR determined that implementation of the SAFRR project would result in less than significant impacts to aesthetics and visual resources.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. Surrounding land uses include single family residences to the south and west, recreational and open space areas to the north across Sir Francis Drake Boulevard, and the San Geronimo Treatment Plant to the east.

The proposed action would be located between San Geronimo Creek and nearby private properties. When seen from nearby public trails in Maurice Thorne Memorial Preserve, Roy’s Redwoods Preserve, or Gary Giacomini Preserve, this site would be concealed in the visual blend of riparian vegetation and trees. Based on intervening trees and topographic features at viewpoints on Sir Francis Drake Boulevard and San Geronimo Valley Drive this site would be concealed. From distant viewpoints the site post-construction appearance would be similar to its

present condition. The proposed action would not result in a new or substantially more severe significant impact on scenic vistas or public views.

There are no designated state scenic highways within view of the proposed action. The proposed action therefore would not alter scenic resources within view of a designated scenic highway. The site of the proposed action is bounded to the north by San Geronimo Creek and its associated riparian vegetation corridor which is being restored as part of a separate project. Temporary visual or aesthetic changes due solely to active construction activities and/or equipment or materials are not considered significant. The proposed action would not involve significant site disturbance and would add riparian vegetation and upland vegetation to the San Geronimo Creek corridor and therefore would not adversely alter the area's visual character or quality. The appearance and visual lines remaining in the area's streetscape, as well as the land use patterns in the area, would not be substantially altered. The proposed action would not result in a new or substantially more severe significant impact related to visual character and quality.

No night-time work is anticipated; thus, no receptors would be exposed to nighttime lighting. The proposed action would comply with Marin County Code for construction hours (see FEIR Section 4.11 Noise for the specific codes).

The proposed action does not include permanent lighting and would not produce light trespass, reflective glare, or shadow in areas that would affect human habitation beyond that which currently exists. The proposed action would not include structures that would cast shadow in areas where none currently exists. Based on this analysis, construction and operation of the proposed action would not result in a new or substantially more severe significant impact related to light, glare, or shadow.

The only cumulative project in the vicinity, the 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit, was completed in 2021. The proposed would eventually merge with the restoration project to create a unified riparian zone along San Geronimo Creek. The proposed action, in combination with the cumulative project, would not result in a new or substantially more severe significant impact related to aesthetics.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to aesthetics and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects on aesthetics.

3.3.2 Agriculture

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
2. Agriculture. Would the Project:					
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	p. 4.4-9	No	No	No	N/A
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	p. 4.4-9	No	No	No	N/A
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	p. 4.4-10	No	No	No	N/A

Findings of FEIR

The FEIR found that the SAFRR project would have no agriculture impacts due to the nature of the project and the zoning or land use of the FDS Basin and Downtown San Anselmo sites.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. Surrounding land uses include single family residences to the south and west, recreational and open space areas to the north across Sir Francis Drake Boulevard, and the San Geronimo Treatment Plant to the east. The parcel that includes the site of the proposed action is zoned for Resort and Commercial Recreation and operated as a golf course until 2017. In 2018 the site was sold, and in 2021 construction of a fish passage and off-channel habitat restoration project was completed in and along San Geronimo Creek near the proposed action area.

The proposed action site is not an area mapped as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance. The parcel is zoned for Resort and Commercial Recreation and not under a Williamson Act contract. The proposed action would not result in any other changes in the existing environment that could result in the conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use because the site is not on Farmland or forest land. The proposed action would not result in a new or substantially more severe significant impact related to agriculture.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to agriculture and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects on agriculture.

3.3.3 Air Quality

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
3. Air Quality. Would the Project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	p. 4.3-37	No	No	No	N/A
b. Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?	p. 4.3-33	No	No	No	N/A
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	p. 4.3-38	No	No	No	N/A
d. Expose sensitive receptors to substantial pollutant concentrations?	p. 4.3-40	No	No	Yes	Yes
e. Create objectionable odors affecting a substantial number of people?	p. 4.3-46	No	No	No	N/A

Findings of FEIR

The FEIR determined that approved SAFRR project construction would not generate significant criteria pollutant emissions with implementation of FEIR Mitigation Measure 4.3-1, BAAQMD Basic Control Measures. The approved SAFRR project was determined to have a less than significant impact with respect to consistency with the Clean Air Plan. With respect to exposure of sensitive receptors to toxic air contaminants (TACs), the FEIR found that the approved SAFRR project would have a less than significant impact after implementation of Mitigation Measure 4.3-4, Tier 4 Engines for Construction Equipment. It was determined that the SAFRR project would not result in objectionable odors, as construction activity would be intermittent and temporary.

Discussion

Setting

This section updates the FEIR’s physical and regulatory setting for the analysis of Air Quality impacts.

The air quality setting relevant to the site of the proposed action, including applicable regulations and air quality conditions, is not appreciably different from that discussed in the FEIR. The Bay Area Air Quality Management District (BAAQMD) continues to be the regional authority for air quality management in the area of the proposed action and the entire San Francisco Bay Area Air Basin (Bay Area).

The Federal Clean Air Act and the California Clean Air Act both require the establishment of standards for ambient concentrations for criteria air pollutants, and the designation of areas as “attainment” or “nonattainment” based on whether standards have been met in those areas. The state and federal non-attainment status of the Bay Area has not changed since adoption of the FEIR. The Bay Area continues to experience occasional violations of ozone and particulate matter (PM₁₀ and PM_{2.5}) standards. Therefore, the area of the proposed action currently is designated as a non-attainment area for violation of the state 1-hour and 8-hour ozone standards, the federal ozone 8-hour standard, the state respirable particulate matter (PM₁₀) 24-hour and annual average standards, the state fine particulate matter (PM_{2.5}) annual average standard, and the federal PM_{2.5} 24-hour standard.

The most recently adopted air quality plan to address nonattainment issues for the Bay Area remains the 2017 Bay Area Clean Air Plan (2017 Clean Air Plan), which is discussed in FEIR Section 4.3, Air Quality and Greenhouse Gas Emissions. The significance thresholds used in the FEIR were based on the 2017 BAAQMD CEQA Air Quality Guidelines, which have not been revised since the FEIR was adopted. Consequently, the approach implemented in the FEIR remains the latest guidance and no changes to the approach used in the FEIR are warranted at this time.

The nearest sensitive receptors to the site of the proposed action are residences approximately 175 feet to the southeast. Multiple residences are present within a 1,000-foot radius of the site of the proposed action. Residential receptors were a similar distance from construction activities proposed at the Downtown San Anselmo site evaluated in the FEIR.

Impact Discussion

Since FEIR publication, the FDS Basin has been constructed. The proposed action (mitigation planting) would involve up to six weeks of construction activity, and for purposes of analysis is assumed to occur concurrently with the remaining SAFRR project construction (work at the Downtown San Anselmo site). To evaluate air quality impacts due to construction activities, the FEIR calculated the average daily emissions from construction activities at the FDS Basin and in Downtown San Anselmo, assuming construction activities proceeded concurrently at both locations and lasted approximately seven months. As detailed on FEIR pages 4.3-33 through 4.3-35, the FEIR evaluated 1,933 haul truck trips, 811 heavy-duty truck roundtrips, 735 pickup truck roundtrips, and an average of 30 roundtrip worker trips per day associated with the FDS Basin construction alone.

For the proposed action, offroad equipment would be limited to forklifts and one small excavator or backhoe. Up to 30 onroad roundtrips per day would be generated by workers at the site. No haul trucks would be needed for the proposed action as there would not be mass excavation of soils at

the site. While the proposed action would require less construction equipment over a shorter duration than the FDS Basin, for purposes of analysis it is assumed that the mitigation planting would have the same emissions as the FDS Basin construction. As shown in FEIR Table 4.3-6, emissions from the FDS Basin construction would not exceed BAAQMD significance thresholds. In addition, the grand total emissions of the combined construction activities (at the FDS Basin and Downtown San Anselmo) would not exceed BAAQMD significance thresholds. BAAQMD significance thresholds have not changed since certification of the FEIR. Therefore, emissions from construction of the proposed action, including in combination with the remaining SAFRR project activities, would not exceed BAAQMD significance thresholds for criteria air pollutants and would not conflict with or obstruct implementation of the applicable air quality plan. The proposed action would not result in a new or substantially more severe significant impact related to conflicts with or obstruction of an applicable air quality plan.

In the FEIR, air quality impacts during operations were calculated assuming maintenance activities would require operating an excavator 10 hours per days for six days each year and offhaul of up to 290 cubic yards of sediment per day for six days each year. The proposed action would not require maintenance activities needing such equipment or for such durations. As shown in FEIR Table 4.3-7, the grand total emissions of the combined operations activities would not exceed BAAQMD significance thresholds. Emissions from maintenance at the site of the proposed action would be even lower and therefore would not exceed BAAQMD significance thresholds for criteria air pollutants and would not conflict with or obstruct implementation of the applicable air quality plan. The proposed action would not result in a new or substantially more severe significant impact related to exceeding criteria air pollutant thresholds.

The nearest sensitive receptors to the site of the proposed action are residences approximately 175 feet to the southeast. Multiple residences are present within a 1,000-foot radius of the site of the proposed action. None of the residences near the proposed action are within 1,000 feet of remaining SAFRR project construction (the nearest components of the SAFRR project are 3 miles to the east). Residential receptors were a similar distance from construction activities proposed at the Downtown San Anselmo site evaluated in the FEIR. The proposed action would generate less diesel particulate matter than disclosed in the FEIR because less construction equipment would be used for a shorter period of time; however, it is conservatively assumed that the proposed action could result in similar levels of diesel particulate matter and therefore could exceed the BAAQMD's significance thresholds for exposure to health risks. With implementation of adopted Mitigation Measures 4.3-1, BAAQMD Basic Construction Measures, and 4.3-4, Tier 4 Engines for Construction Equipment, this impact would be less than significant with mitigation. The proposed action would not result in a new or substantially more severe significant impact related to toxic air contaminant emissions.

Regarding odors, the use of diesel fuel in construction equipment could generate localized objectionable odors. If sensitive receptors are located in the immediate vicinity of these activities, odors could be perceivable and constitute a nuisance impact. The proposed action would take approximately 6 weeks to complete and would take place within the construction hours specified by the applicable local ordinance (discussed in FEIR Section 4.3). Any objectionable odors generated by construction and operational activities of the proposed action and perceived by

sensitive receptors would occur on a short-term basis, or would be intermittent. The proposed action would not result in a new or substantially more severe significant impact related to odors.

Mitigation Measures

Mitigation measures applicable to the San Anselmo Flood Risk Reduction Project are listed in Appendix A, San Anselmo Flood Risk Reduction Project Mitigation Monitoring and Reporting Program. The following adopted air quality mitigation measures are applicable to the Project. No mitigation measures require revision.

Adopted Mitigation Measure 4.3-1: BAAQMD Basic Construction Measures.
Measures to limit dust, criteria pollutants, and precursor emissions associated with construction.

Adopted Mitigation Measure 4.3-4: Tier 4 Engines for Construction Equipment.
Emissions standards for certain construction equipment.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, potentially significant impacts of the proposed action related to air quality would be less than significant with implementation of previously adopted Mitigation Measures 4.3-1 and 4.3-4. No changes to the existing Mitigation Measures, and no additional mitigation measures, are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects on air quality.

3.3.4 Biological Resources

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
4. Biological Resources. Would the Project:					
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	p. 4.5-38 p. 4.5-44 p. 4.5-45 p. 4.5-48	No	Yes	No	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	p. 4.5-49	No	No	No	N/A
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	p. 4.5-53	No	No	No	N/A
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	p. 4.5-54	No	No	No	N/A
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	p. 4.5-55	No	No	No	N/A
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	p. 4.5-37	No	No	No	N/A

Findings of FEIR

The FEIR evaluated impacts to fish and other aquatic species (Impact 4.5-1), rare plants (Impact 4.5-2), California red-legged frog and western pond turtle (Impact 4.5-3), nesting birds (Impact 4.5-4), northern spotted owl (Impact 4.5-5) and bats (Impact 4.5-6). Mitigation measures (Measures 4.5-1a, 4.5-1b, 4.5-1c, 4.5-2, 4.5-3a, 4.5-3b, 4.5-4, and 4.5-6) were found to be sufficient to reduce all impacts on special-status species to less-than-significant levels. Thus, the SAFRR project had less-than-significant effects on biological resources with implementation of mitigation.

Discussion

The site of the proposed action is approximately 3 miles west of the FDS basin site and located in the headwaters of the Lagunitas Creek watershed. The climate at the site of the proposed action is similar to the climate at the FDS basin site. The site is currently annual grassland that is bordered to the north by riparian forest along perennial San Geronimo Creek. Annual grassland provides little cover for wildlife, yet numerous species forage, and several species breed in this habitat.

This supplemental environmental review included an updated search of the California Natural Diversity Data Base (CNDDB), U.S. Fish & Wildlife Service Information for Planning and Consultation (iPaC) database, and California Native Plant Society (CNPS) records to review special-status species occurrence records from San Geronimo Creek and vicinity, as well as reviews of aerial photography and existing biological reports from the vicinity of the site of the proposed action (ESA, 2015). Special-status species on the occurrence record lists have low potential to occur at the site.

Fish and Other Aquatic Resources

The FEIR, Impact 4.5-1, found that in-water construction activities including dewatering and construction of diversion and weir structures could result in a significant impact to special-status aquatic biological resources. The site of the proposed action would not require in-water work and thus, would have no impact on fish or other aquatic resources. Therefore, the proposed action would not result in a new or more severe significant impact on aquatic biological resources.

Special-Status Plants

The FEIR analyzed potential impacts to many special-status species with potential to occur at SAFRR project sites. Three rare plants were considered to have moderate potential to occur, but none of these species, nor other rare plants, were observed during pre-construction rare plant surveys conducted during the appropriate blooming periods for these species. These species have low potential to occur at the site of the proposed action. Mitigation Measure 4.5-2 in the FEIR required surveys for special-status plants to be conducted by a qualified botanist prior to construction during the appropriate season, and relocation, salvage, and monitoring if rare plants were found. This measure covers all the areas to be impacted during restoration, and would also apply to the site of the proposed action. Thus, the proposed action would not result in any new or more severe significant impacts on rare plants.

California Red-Legged Frog and Western Pond Turtle

As discussed in FEIR Impact 4.5-3, California red-legged frog and western pond turtle occur in other parts of Marin County and may pass through the watershed. Special-status amphibian species may be present during foraging or dispersal movements and individuals could be subject to injury or mortality or to habitat loss from construction traffic, vegetation removal, noise or human traffic. Mortality or injury to special-status amphibians, or destruction of substantial habitat, would be a significant impact. Previously adopted Mitigation Measure 4.5-3b in the FEIR requires a pre-construction survey for California red-legged frog and western pond turtle. In addition, exclusionary fencing and biological monitoring is required under Mitigation Measure 4.5-3a. These mitigation measures reduced impacts to a less-than-significant level for these species. Because the proposed action is in uplands, outside suitable habitat for these species, planting at this location would have a less-than-significant impact on California red-legged frog and western pond turtle, with no mitigation required. Thus, the proposed action would not result in any new or more severe significant impacts on California red-legged frog or western pond turtle.

Nesting Birds, including Northern Spotted Owl

The FEIR found that construction activities could disturb nesting migratory birds protected under the Migratory Bird Treaty Act and California Fish and Game Code 3503, resulting in significant impacts (Impact 4.5-4). In addition, construction could disturb nearby nesting northern spotted owl (*Strix occidentalis caurina*), a federal Threatened species. Two northern spotted owl activity centers are present 1/2 to 3/4-mile from the site of the proposed action (CDFW, 2023). Nearby nesting owls may be disturbed by exposure to a substantial increase in noise or human presence during proposed action activities. Construction and maintenance activities that cannot be avoided within 1/4-mile of spotted owl activity centers could result in take of nesting owls. However, the proposed action would not take place during nesting season within 1/4-mile of active northern spotted owl nests.

Potential nesting habitat for migratory birds occurs along San Geronimo Creek in riparian vegetation, or in grassland or ruderal habitat. Clearing, grading, and other construction activities during restoration could disturb or destroy active nests, or cause nest abandonment and death of young, if active nests are present. Previously adopted Mitigation Measure 4.5-4 requires surveys for nesting birds prior to vegetation removal or nearby activities during bird nesting season. For northern spotted owl, a buffer of 1/4-mile would be maintained around identified owl activity centers. For migratory birds, a suitable buffer would be placed around active nests until young have fledged. Implementation of this mitigation measure at the site of the proposed action would avoid a new or substantially more severe impact on nesting birds, including northern spotted owl. Thus, the proposed action would not result in a new or more severe significant impact on nesting migratory birds, including northern spotted owl.

Bats

The FEIR found that bat roosts in trees or nearby buildings could be disturbed by construction activities that damage or remove bat roosting habitat such as trees or structures. No tree or

building removal is planned at the site of the proposed action. Thus, the proposed action would not result in a new or more severe significant impact on roosting bats.

Riparian Habitat or Other Sensitive Natural Communities

Since certification of the FEIR the proposed action has been identified to provide in-kind mitigation for loss of riparian habitat at the SAFRR sites. The site of the proposed action does not presently contain riparian woodland or another natural community; thus, the impact under this criterion remains less than significant. The proposed action would not result in a new or more severe significant impact on sensitive upland vegetation communities.

Protected Wetlands

Federally jurisdictional wetlands are traditionally considered those areas with characteristic hydrology, vegetation and soils which are adjacent to or have a significant nexus with navigable waters (USACE 2007). The California Department of Fish and Wildlife typically extends jurisdiction over wetlands and waters covered under Lake and Streambed Alteration Agreements (Fish and Game Code Section 1602). All wetlands and waters would be avoided at the site of the proposed action; thus, the proposed action would not result in a new or more severe significant impact on wetlands.

Migratory Wildlife and Wildlife Nursery Sites

While wildlife uses San Geronimo Creek as a movement corridor, no mitigation work would occur within the creek or surrounding riparian habitat, and no trees would be removed to implement the proposed action. The proposed action would not result in a new or more severe significant impact to wildlife corridors or nursery sites.

Local Policies and Ordinances

Marin County has adopted a native tree protection and preservation ordinance (Ordinance 3342, 2002). No tree removal is planned at the San Geronimo Valley restoration site. Thus, the proposed action would not conflict with any provisions of the Marin County Code, nor with other regional or local plans. The proposed action would not result in a new or more severe significant impact arising from conflict with the local tree protection ordinance or other local policies or ordinances.

Habitat Conservation Plans

No habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans apply to the site of the proposed action, and there would be no impact arising from conflicts with habitat conservation plans. Thus, the proposed action would not result in a new or more severe significant impact on provisions of a habitat conservation plan.

The only cumulative project in the vicinity, the 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit, was completed in 2021. The proposed action's biological resources impacts would occur during construction. The fisheries restoration project is complete, and therefore would not cause cumulative construction

impacts. The District would implement the mitigation measures listed below to reduce impacts during construction of the proposed action. The District would also implement adopted mitigation measures for the remaining SAFRR project construction activities. Therefore, the cumulative biological resources impact of the proposed action and the completed restoration project would be less than significant. The proposed action would not result in new or more severe significant cumulative impacts related to biological resources.

Mitigation Measures

Mitigation measures applicable to the San Anselmo Flood Risk Reduction Project are listed in Appendix A, San Anselmo Flood Risk Reduction Project Mitigation Monitoring and Reporting Program. The following adopted biological resources mitigation measures are applicable to the Project. No mitigation measures require revision.

Adopted Mitigation Measure 4.5-2: Avoid Impacts to Rare Plants. Special-status plant surveys and avoidance.

Adopted Mitigation Measure 4.5-3b: Avoid Impacts to California Red-legged Frog and Western Pond Turtle. Preconstruction California Red-legged Frog and Western Pond Turtle surveys and avoidance.

Adopted Mitigation Measure 4.5-4: Avoid Impacts to Special-status and Nesting Birds, including Raptors and Northern Spotted Owls. Preconstruction owl and nesting bird surveys and avoidance.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, potentially significant impacts of the proposed action related to biological resources would be less than significant with implementation of previously adopted Mitigation Measures 4.5-2, 4.5-3b, and 4.5-4. No changes to the existing Mitigation Measures, and no additional mitigation measures, are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects on biological resources.

3.3.5 Cultural Resources and Tribal Cultural Resources

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
5. Cultural Resources. Would the Project:					
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	p. 4.6-20	No	No	No	NA
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	p. 4.6-20	No	Yes	No	Yes
c. Disturb any human remains, including those interred outside the formal cemeteries?	p. 4.6-21	No	Yes	No	Yes
d. Cause a substantial adverse change in the significance of a tribal cultural resource?	p. 4.6-21	No	Yes	No	Yes

Findings of FEIR

The FEIR determined that there would be less-than-significant impacts to cultural resources with compliance of Marin Development Code Section 22.20.040 (D), which requires that construction cease in the event of a discovery of cultural resources so the find can be assessed by a qualified archaeologist. The certified FEIR also determined that there would be less-than-significant impacts to human remains if identified during project construction with compliance of Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, which require the County coroner assess the remains and, if determined to be Native American, the Native American Heritage Commission be contacted to assign a most likely descendant who would make recommendations for the treatment and disposition of the remains.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. The site of the proposed action is on the south side of San Geronimo Creek. Surrounding land uses include single family residences to the south and west, recreational and open space areas to the north across Sir Francis Drake Boulevard, and the San Geronimo Treatment Plant to the east. The site parcel of the proposed action is zoned for Resort and Commercial Recreation and operated as a golf course until 2017. In 2018 the site was sold, and in 2021 construction of a fish passage and off-channel habitat restoration project was completed in and along San Geronimo Creek near the area of the proposed action.

Historical resources, herein referring to historic-era architectural resources or the built environment, include buildings, structures, and objects, listed or eligible for listing in the California Register of

Historical Resources (California Register). A significant impact could occur if the proposed action would cause a substantial adverse change to a historical resource through physical demolition, destruction, relocation, or alteration of the resource. There are no historical resources in the site of the proposed action and, therefore, there would not be new or substantially more severe significant impact on historical resources.

Archaeological resources can be considered historical resources, according to CEQA Guidelines section 15064.5, as well as unique archaeological resources, as defined in PRC section 21083.2(g). A significant impact could occur if the proposed action would cause a substantial adverse change to an archaeological resource through physical demolition, destruction, relocation, or alteration of the resource. Based on the results of background research, there is one previously recorded archaeological resource in the vicinity of the site of the proposed action. This resource (designated P-21-000669) is a site with both a Native American component consisting of a concentration of flaked-stone debitage and tools, and ground-stone tools, and a historic-period component consisting of glass, ceramics, milled lumber, and hardware; the site was previously evaluated as California Register-eligible under Criterion 4 (Angeloff, 2020). Due to the presence of P-21-000669 in the vicinity of the 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit project, the site of the proposed action and surrounding area was designated an archaeologically sensitive area that was subject to full-time archaeological and Native American monitoring during ground-disturbing activities according to an approved Monitoring and Discovery Plan (HSU, 2020). The results of the monitoring during restoration activities expanded the site boundary (due to presence of additional pre-contact and historic-period artifacts) and an updated Department of Parks and Recreation 523 form set (site record) was filed with the Northwest Information Center of the California Historical Resources Information System (HSU, 2021).

The San Anselmo Flood Risk Reduction Project FEIR did not identify archaeological resources in the SAFRR project site and relied on Marin Development Code Section 22.20.040 (D), Public Resources Code Section 5097.98, and Health and Safety Code Section 7050.5 for protocol to follow in the event of an inadvertent discovery of cultural materials or human remains during construction.

One archaeological resource, P-21-000669 discussed above, is in the vicinity of the site of the proposed action. The site of the proposed action is subject to full-time archaeological and Native American monitoring during ground-disturbing activities required consistent with the Monitoring and Discovery Plan (HSU, 2020). The Plan was prepared for and approved to comply with CEQA, Section 106 of the National Historic Preservation Act, and State Historic Preservation Officer (SHPO) consultation.

While not expected, cultural materials could be uncovered during additional ground-disturbing activity in the site of the proposed action. Ground disturbance within the mitigation planning site is subject to the Monitoring and Discovery Plan and Marin Development Code Section 22.20.040(D), which requires that construction cease in the event of a discovery of cultural resources so the find can be assessed by a qualified archaeologist. The proposed action would not result in new or substantially more severe significant impacts on cultural or tribal cultural resources.

The geographic scope for cumulative effects on cultural resources includes the immediate vicinity of locations where the proposed action could cause disturbance to historical resources, unique archaeological resources, human remains, and/or tribal cultural resources. The only cumulative project in the vicinity, the 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit, was completed in 2021, and was required to comply with the approved Monitoring and Discovery Plan (HSU, 2020). The cumulative impact of the proposed action and the restoration project would be less than significant because the restoration project is complete and complied with the approved Monitoring and Discovery Plan as well as all applicable regulations. The proposed action would not result in new or substantially more severe significant cumulative impacts on cultural or tribal cultural resources.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant environmental impacts related to cultural resources than those that were identified in the FEIR through implementation of the existing Monitoring and Discovery Plan (HSU, 2020), which requires an archaeological monitor and a tribal monitor present during any ground disturbing activity in the archaeological sensitive areas near P-21-000669, as well as the Marin Development Code Section 22.20.040(D), Public Resources Code Section 5097.98, and Health and Safety Code Section 7050.5. No changes to existing Mitigation Measures, and no additional mitigation measures, are required.

The changed circumstance of the addition of tribal cultural resources as a topic in the CEQA Guidelines, has been considered; the Project would not result in a new significant impact related to tribal cultural resources. The Project would not result in new significant environmental effects on tribal cultural resources.

3.3.6 Energy

Environmental Issue Area	Where Impact Was Analyzed in FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
6. Energy. Would the Project:					
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	p. 4.4-10	No	No	No	N/A
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	p. 4.10-14	No	No	No	N/A

Findings of FEIR

The FEIR determined that with implementation of FEIR Mitigation Measure 4.3-1, BAAQMD Basic Control Measures, SAFRR project construction would have less-than-significant impacts related to the SAFRR project’s use of energy. The SAFRR project was found to have a less-than-significant impact related to use of energy during operations.

Discussion

Setting

At the time of FEIR publication, Appendix F (Energy Conservation) and Appendix G (Environmental Checklist Form) of the State CEQA *Guidelines* did not list potential thresholds of significance for an evaluation of energy-related impacts. For the purposes of the FEIR analysis, the following applicable thresholds of significance consistent with Appendix N of the County’s Environmental Impact Review Guidelines (EIR Guidelines; Marin County, 1994), were used to determine whether implementing the SAFRR project would result in a significant impact related to energy use. An impact related to energy resources is considered significant if implementation of the proposed action would do any of the following when compared against existing conditions:

- a) Utilize energy, oil, or natural gas in an inefficient manner
- b) Encourage activities that would result in the use of large amounts of energy, oil, or natural gas
- c) Exceed the capacity of the energy supplier to supply the project’s energy needs with existing or planned supplies
- d) Require the development of new energy resources

Since FEIR adoption, the State CEQA Guidelines were updated to require an examination of energy impacts of a project. A significant impact may occur if a project would result in wasteful, inefficient, or unnecessary consumption of energy, including the project's transportation energy use.

The Marin Countywide Plan's Energy and Green Building Element establishes goals and policies for energy consumption, and conservation. The Energy and Green Building Element includes no policies that directly apply to restoration activities or general construction fuel use.

Policies of the Marin County Climate Action Plan (Marin County, 2020), though related to energy usage, are discussed in Section 3.3.8 Greenhouse Gas Emissions.

Impact Discussion

The proposed action would require the use of minimal energy resources for construction, operation, and maintenance of the mitigation planting. After six weeks of construction, during which most of the planning would be done by hand, the anticipated maintenance would occur on an as-needed basis. The proposed action would not increase energy usage during operations. The use of fuel for construction equipment and worker transportation would not be wasteful, inefficient, or unnecessary such that potentially significant environmental effects would result. The proposed action would not have a new or substantially more severe significant impact involving wasteful, inefficient, or unnecessary consumption of energy resources than identified in the FEIR.

The potential for the proposed action to conflict with or obstruct policies of the state or Marin County related to greenhouse gas emissions is discussed in Section 3.3.8, Greenhouse Gas Emissions. The proposed action would restore riparian and upland vegetation within an area proposed for use as a park and zoned for resort and commercial recreation; therefore, the proposed action would not conflict with a state or local plan for renewable energy. The proposed action would not increase energy usage during operations. Therefore, the proposed action would not conflict with or obstruct a state or local plan for energy efficiency. The proposed action would not have a new significant impact related to a conflict or obstruction of a state or local plan for renewable energy or energy efficiency.

Mitigation Measures

Mitigation measures applicable to the San Anselmo Flood Risk Reduction Project are listed in Appendix A, San Anselmo Flood Risk Reduction Project Mitigation Monitoring and Reporting Program. Implementation of Mitigation Measure 4.3-1, BAAQMD Basic Control Measures, is discussed in Section 3.3.3, Air Quality.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to energy and no mitigation measures are required. The changed circumstance of impact thresholds based on the State CEQA Guidelines Appendix G (Environmental Checklist) questions has been

considered; the proposed action would not result in a new significant impact related to energy due to the changed circumstance. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy.

3.3.7 Geology and Soils

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
7. Geology and Soils. Would the Project:					
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? 	p. 4.7-22	No	No	No	N/A
b. Result in substantial soil erosion or the loss of topsoil?	p. 4.7-25	No	No	No	N/A
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	p. 4.7-26	No	No	No	N/A
d. Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	p. 4.7-26	No	No	No	N/A
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	p. 4.7-21	No	No	No	N/A
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	p. 4.6-21	No	No	No	N/A

Findings of FEIR

The FEIR determined that, with implementation of geotechnical recommendations and compliance with relevant design standards, the SAFRR project would have less-than-significant impacts related to geology and soils. The FEIR determined that the SAFRR project would have no impact on paleontological resources or unique geologic features.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. The geology at the site of the proposed action consists of Holocene-age alluvium, which extends into the subsurface approximately 74 feet below ground surface (bgs), underlain by Jurassic- to Cretaceous-age Franciscan Formation volcanic and metamorphic rocks (Blake et al., 2000). The site of the proposed action is not within an established Earthquake Fault Zone or a seismic hazard zone (California Geological Survey, 2023).

The site of the proposed action is not within an established Earthquake Fault Zone and would not alter the risk of surface fault rupture. The proposed action is in the vicinity of the North Coast Section of the San Andreas fault zone (approximately 5 miles southwest of the proposed action); in the event of an earthquake the proposed action would be subject to strong seismic ground shaking and subsequent seismic-related ground failures (i.e., liquefaction, lateral spreading, and landslides). However, the proposed action would not build any habitable structures and, therefore, would not directly or indirectly cause adverse effects related to the previously mentioned geologic hazards. The proposed action would not result in new or substantially more severe significant seismic hazard impacts.

Construction of the proposed action would involve localized ground disturbance activities, such as the removal of non-native plant species and the excavation of holes for the planting of trees and plants. Consistent with Section 28.18.093 of the County Municipal Code, which requires implementation of construction-phase best management practices designed to protect water quality, disturbed areas would be protected with specified erosion control measures (e.g., jute, straw, coconut fiber erosion control fabric, coir logs, straw, silt fencing) throughout the staging areas and planting sites during construction. Therefore, the proposed action would not result in substantial erosion or the loss of topsoil and would not result in new or substantially more severe significant impacts related to this topic.

The proposed action does not include increased groundwater or petroleum oil withdrawal and thus, there would be no subsidence-related impacts. Liquefaction and lateral spreading are more commonly driven by seismic events, as discussed above, and the proposed action is not expected to exacerbate the risk of such hazards. Compliance with existing regulations and construction best management practices would further limit slope instability during construction. Further, the addition of trees and other plants would increase the integrity of the underlying soils. The proposed action would not result in new or substantially more severe significant impacts related to this topic.

While expansive soil can present a risk to structures, the proposed action would not include the construction of any structures. The proposed action therefore would not create risks to life or property due to expansive soils and would not result in new or substantially more severe significant impacts related to this topic.

The proposed action would plant trees and other vegetation and would not include the installation of septic tanks or alternative wastewater disposal systems and would not result in new or substantially more severe significant impacts related to this topic.

No significant paleontological resources have been uncovered at or near the site of the proposed action. Holocene-age alluvium is generally considered to have a low potential to contain significant paleontological resources at the surface; however, the potential to encounter significant paleontological resources increases with increased depth. The planting holes required to install the specified plants and trees would be excavated to a depth between 6 and 24 inches bgs, which is expected to be too shallow to increase the potential to encounter significant paleontological resources. The proposed action would not result in new or substantially more severe significant impacts related to paleontological resources.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to geology and soils and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects on geology and soils.

3.3.8 Greenhouse Gas Emissions

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
8. Greenhouse Gas Emissions. Would the Project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	p. 4.3-47	No	No	No	N/A
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	p. 4.3-47	No	No	No	N/A

Findings of FEIR

The FEIR determined that the approved SAFRR project would not conflict with applicable plans and policies and would not exceed the BAAQMD-recommended thresholds of significance for greenhouse gas emissions; therefore, the approved SAFRR project was found to have a less than significant impact associated with greenhouse gas emissions.

Discussion

Setting

This section updates the FEIR’s regulatory setting for the analysis of greenhouse gas emissions impacts.

Statewide and regional climate change planning has proceeded since adoption of the FEIR. In September 2018, Governor Brown signed SB 100 into law, setting a state target of 100 percent carbon-free electricity by 2045. SB 100 also sets interim requirements for 50 percent renewable electricity by 2026 and 60 percent by 2030, superseding previously established targets. Also in September 2018, Governor Brown signed Executive Order B-55-18, which establishes a new statewide goal to “achieve carbon neutrality as soon as possible, no later than 2045, and achieve and maintain net negative emissions thereafter.”

In September 2022, Governor Newsom signed AB 1279, the California Climate Crisis Act which requires the state to achieve net-zero GHG emissions no later than 2045, and achieve and maintain net negative GHG emissions thereafter. The bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels, and directs the California Air Resources Board (CARB) to work with relevant state agencies to achieve these goals.

The CARB Climate Change Scoping Plan was most recently updated in 2022 to incorporate the 85 percent reduction and carbon neutrality targets for 2045 established by AB 1279. The actions

and outcomes in the 2022 Scoping Plan aim to achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

BAAQMD most recently updated its *CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans* in April 2022. In response to SB 32’s target for 2030 and EO B-15 target for carbon neutrality no later than 2045, BAAQMD adopted new CEQA significance thresholds for GHGs and published a Justification Report (BAAQMD, 2022). For land use development projects, BAAQMD recommends using the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California’s efforts to meet the State’s long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its “fair share” of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (62 Cal.4th 220–223).

Applying this approach, BAAQMD analyzed what will be required of new land use development projects to achieve California’s long-term climate goal of carbon neutrality by 2045. BAAQMD, based on this analysis, has identified best management practices as significance thresholds that projects would have to comply with to ensure consistency with the state’s long-term GHG reduction goals. BAAQMD developed these thresholds of significance based on typical residential and commercial land use projects focusing on operational emissions from building energy use and transportation, which represent the vast majority of project GHG emissions and would not be applicable to restoration projects such as the proposed action. In addition, BAAQMD has not identified a construction-related climate impact threshold at this time.

The BAAQMD *CEQA Thresholds* also state that, alternatively, a project may be found to have a less-than-significant impact related to GHG emissions if it complies with a locally adopted GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Since adoption of the FEIR, and subsequent to changes in state GHG reduction goals, the Marin County Climate Action Plan has been updated. The Marin County Climate Action Plan 2030 (2030 CAP), adopted by the County Board of Supervisors on December 8, 2020, updates the County’s previous 2014 climate action plan to make it consistent with current State GHG reduction goals and inventory methodologies, and to incorporate the outcome of Drawdown: Marin. Drawdown: Marin was a two-year planning process conducted by the County Community Development Agency that engaged residents and businesses in a comprehensive, science-based, countywide campaign to identify actions to dramatically reduce GHG emissions, address equity, and increase community resilience.

In the 2030 CAP, the County establishes the goals of reducing GHG emissions 40 percent below 1990 levels by 2030, and, through a combination of emission reductions and carbon sequestration,

reducing net carbon emissions to 60 percent below 2005 levels by 2030 (a goal initially established by Drawdown: Marin), and to zero by 2045. These targets meet and exceed the State goals of reducing emissions 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. To establish the 1990 baseline for the 2030 goal, and consistent with CARB's guidance to local governments, the 2030 CAP estimates 1990 emissions levels as 15 percent below 2005 levels. Using this methodology, GHG emissions from the unincorporated County area in 1990 are estimated at 419,632 MTCO_{2e}, based on the 2005 inventory of 493,685 MTCO_{2e}. The 2030 CAP reports that in 2018 emissions were 380,318 MTCO_{2e}, about 23 percent below the 2005 level, and about 10 percent below the 1990 level.

The 2030 CAP is a "Qualified GHG Reduction Plan" within the meaning of CEQA Guidelines Section 15183.5, which means that a finding of consistency with the 2030 CAP may be used to determine that a project's GHG impacts would be less than significant.

Impact Discussion

The GHG emissions inventory in the 2030 CAP, Off-Road Sector, includes emissions from the combustion of gasoline and diesel from the operation of off-road vehicles and equipment used for construction, landscape maintenance, and agriculture. This sector emitted 4,471 MTCO_{2e} in 2018, accounting for about 1.2 percent of emissions from the unincorporated County. About 64 percent of emissions from this sector were from off-road construction equipment. While the 2030 CAP identifies State regulatory actions and local strategies to reduce emissions from small off-road equipment such as lawn and garden equipment, the 2030 CAP does not contain any actions or strategies related to large scale construction equipment. The 2030 CAP indicates that while CARB is currently considering regulating small off-road engines, construction and agricultural equipment are regulated by the federal government and are not subject to CARB regulation.

Greenhouse gas emissions from the proposed action would be generated primarily during construction by the use of light mechanical equipment, and automobile and truck trips associated with commuting workers.

As discussed above, BAAQMD has not adopted quantitative or qualitative significance thresholds for the evaluation of GHG emissions from construction. GHG emissions from off-road construction equipment represent a very small portion of overall statewide emissions (0.6 percent), and CARB has identified only limited emission reduction strategies to control emissions from off-road construction equipment. Therefore, CARB's climate action planning has focused on the reduction of operational emissions that have technology available to yield greater reductions. In other words, CARB estimates that the state can achieve its 2030 target with very limited emission reductions in the construction sector. The 2017 Scoping Plan Update calls for reducing emissions from certain sources substantially (like vehicle emissions and building energy use) while not targeting emissions for other sources (like construction emissions). The 2022 Update, which lays out a sector-by-sector roadmap for California to decarbonize the economy and achieve carbon neutrality by 2045, identifies transportation electrification, VMT reduction and building decarbonization as the main areas for GHG reductions with residual emissions addressed by re-envisioning the natural and working lands for carbon storage and sequestration. Under this strategy, the state can still achieve

its 2030 GHG reduction target without relying on the reductions in the construction sector. Similarly, the BAAQMD thresholds focus on operational GHG emissions from land use development projects that provide major reductions and do not rely on any reduction in GHG emissions from the construction sector to meet the state's GHG reduction goals for 2030 and beyond. Because BAAQMD's thresholds are based on consistency with statewide targets, the conclusion that emissions from construction are less than significant is warranted.

For these reasons, the construction-related GHG emissions of the proposed action are not considered cumulatively considerable, and the impact would be less than significant. The proposed action would not result in new or substantially more severe significant impacts related to construction greenhouse gas emissions.

Once operational, the proposed action would not increase staff at the District nor would it generate any new operational and maintenance truck trips to the site of the proposed action. Additionally, the proposed action does not introduce any new stationary sources of pollutants. Therefore, there would be no increase in direct GHG emissions at the site of the proposed action over existing conditions. Once operational, the proposed action would not change the energy requirements at the site, increase water use or generate wastewater and solid waste. Therefore, there would be no increase in direct or indirect GHG emissions due to operation of the proposed action and the proposed action would not result in new or substantially more severe significant impacts related to greenhouse gas emissions during operation.

The proposed action does not include ongoing transportation, energy use, waste generation, water use, or agricultural activity, and would not obviously conflict with greenhouse gas reduction strategies identified in the 2030 CAP. The proposed action would not result in new or substantially more severe significant impacts related to this topic.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to greenhouse gas emissions and no mitigation measures are required. The changed circumstance of the updated state and local emissions reductions plans and policies has been considered; the proposed action would not result in a new significant impact related to greenhouse gas emissions due to these changed circumstances. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to greenhouse gas emissions.

3.3.9 Hazards and Hazardous Materials

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
9. Hazards and Hazardous Materials. Would the Project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	p. 4.8-19	No	No	No	N/A
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	p. 4.8-21	No	No	No	N/A
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	p. 4.8-18	No	No	No	N/A
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	p. 4.8-21	No	No	No	N/A
e. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	p. 4.8-18	No	No	No	N/A
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	p. 4.8-23	No	No	No	N/A
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	p. 4.8-19	No	No	No	N/A

Findings of FEIR

The FEIR determined that activities at the Downtown San Anselmo site could include activities on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, but implementation of Mitigation Measures 4.8-2a, 4.8-2b, and 4.8-2c would reduce impacts associated with encountering potentially contaminated soil or groundwater to less than significant levels by controlling contact with and release of these materials into the environment. With compliance with existing regulations, the FEIR found that all other potential hazards and hazardous materials impacts would be less than significant.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. The site parcel of the proposed action is zoned for Resort and Commercial Recreation and operated as a golf course until 2017. In 2018 the site was sold, and in 2021 construction of a fish passage and off-channel habitat restoration project was completed in and along San Geronimo Creek near the proposed action. Surrounding land uses include single family residences to the south and west, recreational and open space areas to the north across Sir Francis Drake Boulevard, and the San Geronimo Treatment Plant to the east.

Based on a search of the Department of Toxic Substances Control (DTSC) EnviroStor database and the State Water Resources Control Board (SWRCB) GeoTracker database, there are no listed hazardous materials sites at or near the proposed action (DTSC, 2023; SWRCB, 2023). Additionally, the proposed action is not located on a site that has otherwise been included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

The proposed action would not routinely use, transport, or dispose of hazardous materials and therefore would not result in new or substantially more severe significant impacts related to hazardous materials use or accidental release. The site of the proposed action is not located within one-quarter mile of a school and is not within two miles of a public airport, and therefore would not result in new or substantially more severe significant impacts related to hazardous emission near school or safety hazards near airports. The proposed action would not require any road work or road closures and would not interfere with or impede an emergency response or evacuation plan and would not result in new or substantially more severe significant impacts related to this topic.

According to the Fire and Resource Assessment Program (FRAP) maps published by the California Department of Forestry and Fire Protection (CAL FIRE), the site of the proposed action is within a Moderate Fire Hazard Severity Zone (FHSZ) (CAL FIRE, 2022). While the use of construction equipment can present some risk of fire ignition, the proposed action would be subject to the California Public Resources Code, which includes fire safety regulations that apply to state responsibility areas during the time of year designated as having hazardous fire conditions. During the fire hazard season, these regulations restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on equipment that has an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire-suppression equipment that must be provided on-site for various types of work in fire-

prone areas. The proposed action would not result in new or substantially more severe significant impacts related to this topic.

Mitigation Measures

Mitigation measures applicable to the San Anselmo Flood Risk Reduction Project are listed in Appendix A, San Anselmo Flood Risk Reduction Project Mitigation Monitoring and Reporting Program. None of the adopted Hazards and Hazardous Materials mitigation measures are applicable to the Project.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to hazards and hazardous materials and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects on hazards and hazardous materials.

3.3.10 Hydrology and Water Quality

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/ Resolve Impacts?
10. Hydrology and Water Quality. Would the Project:					
a. Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality?	p. 4.9-40	No	No	No	N/A
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impeded sustainable groundwater management of the basin?	p. 4.9-44	No	No	No	N/A
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:					
i) result in substantial erosion or siltation on- or off-site?	p. 4.9-46	No	No	No	N/A
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	p. 4.9-51	No	No	No	N/A
iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	p. 4.9-37	No	No	No	N/A
iv) impede or redirect flood flows?	p. 4.9-60	No	No	No	N/A
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	p. 4.9-61	No	No	No	N/A
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	p. 4.9-40, p. 4.9-44	No	No	No	N/A

Findings of FEIR

The FEIR determined that the SAFRR project would have significant and unavoidable impacts, with mitigation, related to impeding or redirecting flood flows, and that potential channel scour impacts would be less than significant with mitigation. The FEIR determined that compliance with the Construction General Permit, including preparation and implementation of the

Stormwater Pollution Prevention Plan (SWPPP) and associated BMPs as well as inspection and reporting, would effectively reduce degradation of surface water and groundwater quality to a less-than-significant level. With compliance with existing regulations, the FEIR determined that all other potential hydrology and water quality impacts would be less than significant.

Discussion

Setting

The proposed action is not within the geographic areas analyzed in the FEIR. The proposed action would be implemented along or near the top of bank on the southern side of San Geronimo Creek. San Geronimo Creek is tributary to Lagunitas Creek, and within the headwaters of the Lagunitas Creek watershed. The site of the proposed action is therefore within a separate watershed from the SAFRR project and is located approximately 3 miles west of the SAFRR project FDS basin site. While Lagunitas Creek drains to Tomales Bay and the Pacific Ocean, the area remains within the jurisdiction of the San Francisco Bay Regional Water Quality Control Board and the associated Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The beneficial uses and impairment status of San Geronimo Creek and downstream water bodies are listed in **Table 2**.

TABLE 2
BENEFICIAL USES AND IMPAIRMENT STATUS

Water Body	Beneficial Use(s)	Impairment Status	Pollutants
San Geronimo Creek	Cold Freshwater Habitat (COLD), Fish Migration (MIGR), Preservation of Rare and Endangered Species (RARE), Fish Spawning (SPWN), Warm Freshwater Habitat (WARM), Wildlife Habitat (WILD), Water Contact Recreation (REC-1), Noncontact Water Recreation (REC-2)	Not listed; drains to Lagunitas Creek	N/A
Lagunitas Creek	Agricultural Supply (AGR), Municipal and Domestic Supply (MUN), Freshwater Replenishment (FRSH), COLD, MIGR, RARE, SPWN, WARM, WILD, REC-1, REC-2	At least one beneficial use is not supported; TMDLs have been developed, and the approved implementation plan is expected to result in full attainment	Nutrients Sedimentation/ siltation Pathogens
Tomales Bay	Commercial and Sport Fishing (COMM), Shellfish Harvesting (SHELL), Marine Habitat (MAR), MIGR, RARE, SPWN, WILD, REC-1, REC-2, Navigation (NAV)	At least one beneficial use is not supported; TMDLs have been developed, and the approved implementation plan is expected to result in full attainment	Sedimentation/ siltation Nutrients Mercury Pathogens

SOURCE: RWQCB, *Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin*. With amendments adopted through May 4, 2017.

Two total maximum daily loads (TMDLs) have been identified for water bodies downstream of the proposed action.

The Lagunitas Creek Sediment TMDL establishes sediment and habitat targets for Lagunitas Creek and its Tributaries. To restore properly functioning conditions, the TMDL identifies actions to substantially reduce sand supply to Lagunitas Creek and its tributaries, to substantially increase

the amount of large woody debris in channels, and, where safe and feasible, to reconnect the channel to its floodplain. Channel incision and bank erosion on San Geronimo Creek is identified as one of the sources of sediment load affecting proper stream function. The TMDL estimates that sediment load from channel incision and bank erosion in San Geronimo and Lagunitas creeks must decline by 67 percent to achieve the TMDL. Actions identified in the TMDL to enhance habitat complexity and connectivity in Lagunitas Creek and its tributaries include developing and implementing plans to enhance large woody debris loading and restore natural rates of recruitment to channels.

The overall goal of the Tomales Bay Watershed Pathogens TMDL is to ensure protection of water contact recreational uses and Bay shellfish harvesting, thereby minimizing human exposure to disease-causing pathogens. The TMDL defines allowable density-based water quality bacteria concentrations and prohibits the discharge of human waste. The associated implementation plan specifies the actions necessary to protect and restore beneficial uses. In addition to pathogens, animal and human waste contain nutrients that pose a threat to aquatic ecosystem beneficial uses. Tomales Bay, Walker Creek, and Lagunitas Creek are listed as impaired by excess nutrients. The TMDL addresses Tomales Bay, Lagunitas Creek, Walker Creek, and Olema Creek. Sources of pathogens are: onsite sewage disposal systems, small wastewater treatment facilities and sewage holding ponds, boat discharges, grazing lands, dairies, equestrian facilities, and municipal runoff.

The proposed action does not overlie a delineated groundwater basin (California Department of Water Resources, 2023). The proposed action is mapped within a special flood hazard zone corresponding to the one percent annual chance flood event (also called a 100-year flood hazard zone; MarinMap, 2023).

Impact Discussion

Construction of the proposed action could degrade water quality as a result of construction-related soil disturbance and discharge of construction stormwater. Additionally, fuels and other chemicals used during construction could also degrade the water quality of receiving waters if spilled and entrained into stormwater runoff or dewatering discharges. The primary stormwater pollutant at construction sites is excess sediment. Consistent with Section 28.18.093 of the County Municipal Code, which requires implementation of construction-phase best management practices designed to protect water quality, disturbed areas would be protected with specified erosion control measures (e.g., jute, straw, coconut fiber erosion control fabric, coir logs, straw, silt fencing) throughout the staging areas and planting sites during construction. Implementation of the construction best management practices would reduce the risk of construction-related erosion of sediments and other pollutants from entering San Geronimo Creek. During operation, the proposed action would help meet the Lagunitas Creek Sediment TMDL management objectives by increasing the available sources of woody debris along San Geronimo Creek and securing soil to reduce bank erosion. In addition, the proposed action would not impede achievement of the Tomales Bay Watershed Pathogens TMDL because it would not add or expand any of the identified pathogen source categories. The proposed action would not result in a new or substantially more severe significant impact related to violating water quality standards or waste discharge requirements, or degrading water or groundwater quality.

The proposed action does not overlie a groundwater basin that must be managed in accordance with a groundwater sustainability plan. A temporary irrigation system would be installed and maintained over a period of three to five years to support the successful establishment of the native riparian and upland plantings. The irrigation system would consist of valves and hoses connected to an existing irrigation main line, along with the temporary 5,000-gallon water storage tank. Water for irrigation would be sourced from an existing active groundwater well. However, as the groundwater use would be temporary, the proposed action would not substantially deplete groundwater resources. The proposed action would not create new impervious area and therefore would not interfere with groundwater recharge. Therefore, the proposed action would not result in a new or substantially more severe significant impacts related to sustainable groundwater management of the basin.

The proposed action would not include any activities that would require work within or otherwise alter the course of San Geronimo Creek, nor would it alter the existing drainage pattern at the site of the proposed action. Therefore, the proposed action would not result in a new or substantially more severe significant impact related to erosion, siltation, or flooding on- or offsite. The proposed action would not create impervious surface draining to stormwater drainage systems and would not introduce land uses that could provide substantial additional sources of polluted runoff; therefore, the proposed action would not result in new or substantially more severe significant impacts related to these topics.

According to the Flood Insurance Rate Map (FIRM) published by Federal Emergency Management Agency (FEMA), the proposed action is mapped within a 100-year flood hazard zone (FEMA, 2009). However, the proposed action does not include the construction of any structures that could impede or redirect flood flows, and therefore would not result in new or substantially more severe significant impacts related to impeding or redirecting flood flows.

The proposed action is approximately 8.9 miles west of the San Pablo Bay and approximately 9.7 miles east of the Pacific Ocean. As the proposed action is not near the coast of either of these water bodies there would be no risk of seiche or tsunami. The site of the proposed action is relatively flat and, while adjacent to the San Geronimo Creek, would not be at risk of inundation by mudflow. Once construction is complete, there would be no handling or storage of any hazardous materials or pollutants that would be at risk of being released in the event of inundation at the proposed action. The proposed action would not result in new or substantially more severe significant impacts related to the release of pollutants due to flood inundation.

For the reasons discussed above, the proposed action would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and therefore would not result in new or substantially more severe significant impacts related to this topic.

Mitigation Measures

Mitigation measures applicable to the San Anselmo Flood Risk Reduction Project are listed in Appendix A, San Anselmo Flood Risk Reduction Project Mitigation Monitoring and Reporting

Program. None of the adopted Hydrology and Water Quality mitigation measures are applicable to the Project.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to hydrology and water quality and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to hydrology and water quality.

3.3.11 Land Use and Planning

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
11. Land Use and Planning. Would the Project:					
a. Physically divide an established community?	p. 4.10-13	No	No	No	N/A
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	p. 4.10-14	No	No	No	N/A
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	p. 4.10-17	No	No	No	N/A

Findings of FEIR

The FEIR determined that the SAFRR project would not conflict with local land use plans or policies, physically divide a community, or substantially alter the character or functioning of a community, and that land use and planning impacts of the SAFRR project would be less than significant.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. The site parcel of the proposed action is zoned for Resort and Commercial Recreation and operated as a golf course until 2017. In 2018 the site was sold, and in 2021 construction of a fish passage and off-channel habitat restoration project was completed in and along San Geronimo Creek near the proposed action.⁵ The landscape adjacent to the proposed action is an open meadow with existing walking paths (former golf course cart paths). Future uses anticipated on the parcel would include passive recreation such as walking, jogging, and birdwatching.

⁵ The 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit removed infrastructure comprising of Roy's Pools fish ladder and sheet metal weirs and created a new channel gradient with engineered streambed materials to allow fish passage and hydraulic connectivity along San Geronimo Creek. The project also removed trees and replaced a failing pedestrian bridge in the same location, and created floodplain and off-channel habitat through grading of adjacent land surfaces followed by revegetating disturbed areas with native seeds, plants and trees.

Surrounding land uses include single family residences to the south and west, recreational and open space areas to the north across Sir Francis Drake Boulevard, and the San Geronimo Treatment Plant to the east.

The proposed action would be located between San Geronimo Creek and nearby private properties. The proposed action would not alter existing means of access to the creek or adjacent properties and therefore would not divide an established community. The proposed action would not result in a new or substantially more severe significant impact related to dividing an established community.

Same as the FDS Basin site, the proposed action is located in unincorporated Marin County and subject to the land use policies contained within the Countywide Plan. The site of the proposed action was on the edge of a golf course until recently (2017), and the parcel is zoned as Resort and Commercial Recreation. The Countywide Plan does not include policies applicable to the site of the proposed action that were adopted for the purpose of avoiding or mitigating an environmental effect; the proposed action would not obviously conflict with applicable plans or policies of Marin County. The proposed action would not result in a new or substantially more severe significant impacts arising from a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed action adopted for the purpose of avoiding or mitigating an environmental effect.

There are no adopted habitat conservation plans, natural community conservation plans, or other approved plans that apply to the proposed action. Therefore, the proposed action would not result in new or substantially more severe significant environmental impacts arising from conflicts with an applicable habitat conservation plan or natural community conservation plan.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to land use and planning and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to land use and planning.

3.3.12 Mineral Resources

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
12. Mineral Resources. Would the Project:					
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	p. 4.4-10	No	No	No	N/A
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	p. 4.4-10	No	No	No	N/A

Findings of FEIR

The FEIR determined that the SAFRR project would have no mineral resources impacts because the FDS Basin and Downtown San Anselmo sites do not contain any known mineral resources sites.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. The site parcel of the proposed action is zoned for Resort and Commercial Recreation and operated as a golf course until 2017. In 2018 the site was sold, and in 2021 construction of a fish passage and off-channel habitat restoration project was completed in and along San Geronimo Creek near the proposed action. The site of the proposed action does not contain any known mineral resource sites (Stinson et al., 1982; the site of the proposed action is classified as MRZ 1).

The proposed action would not change the availability of mineral resources because the site of the proposed action does not contain any known mineral resource sites. The proposed action would not result in new or substantially more severe significant impacts related to this topic.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to mineral resources and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to mineral resources.

3.3.13 Noise

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
13. Noise. Would the Project result in:					
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	p. 4.11-18	No	No	No	N/A
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	p. 4.11-19	No	No	No	N/A
c. A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?	p. 4.11-15	No	No	No	N/A
d. A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	p. 4.11-20	No	No	No	N/A
e. For a Project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	p. 4.11-13	No	No	No	N/A
f. For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?	p. 4.11-13	No	No	No	N/A

Findings of FEIR

The FEIR determined that the SAFRR project would have less-than-significant noise impacts because: (a) the SAFRR project would be required to implement a construction noise reduction plan as a condition of approval; (b) the SAFRR project would not operate outside of the daytime construction exemption hours specified in the Marin County and Town of San Anselmo municipal codes (see Table 4.11-6) and would not exceed the Town of San Anselmo construction noise standard; (c) the nearest sensitive land uses to the FDS Basin and Downtown San Anselmo sites would not be exposed to vibration levels that would exceed the established adverse human reaction threshold or the building damage threshold; and (d) sensitive land uses would not be

exposed to noise levels that would exceed the applied FTA adverse community reaction threshold of 90 dBA L_{eq} .

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. Same as the FDS Basin site, the proposed action is located in unincorporated Marin County. Surrounding land uses include single family residences to the south and west, recreational and open space areas to the north across Sir Francis Drake Boulevard, and the San Geronimo Treatment Plant to the east. The nearest residences are slightly over 100 feet from the proposed action.

As described in FEIR Section 4.11.3, Marin County has established exemptions for noise related to construction activities. The allowed construction hours identified in the Marin County municipal code are summarized in FEIR Table 4.11-6. Since construction activities proposed at the site of the proposed action would only occur within the allowed hours identified in the Marin County municipal code (see FEIR Table 4.11-6), construction of the proposed action would be exempt from the County's noise standards. The proposed action would not operate outside of the daytime construction exemption hours specified in the Marin County municipal code (see FEIR Table 4.11-6). Therefore, residences near construction areas of the proposed action would be exposed to noise levels that would not result in violation of Marin County municipal code and the proposed action would not result in new or substantially more severe significant impacts related to this topic.

Temporary sources of groundborne vibration and noise during construction and maintenance activities at the site of the proposed action would result from the use of construction equipment such as bobcats, quad or ATV vehicles, crew trucks and trailers. The construction activities at the site of the proposed action would generate less vibration levels than the construction activities at the FDS Basin and Downtown San Anselmo sites. Because the nearest sensitive land uses to the FDS Basin and Downtown San Anselmo sites would not be exposed to vibration levels that would exceed the established adverse human reaction threshold or the building threshold, the same is assumed for the site of the proposed action. The proposed action would not result in new or substantially more severe significant impacts related to groundborne vibration.

The closest sensitive land use to the proposed action are single-family residences approximately 100 feet to the south and west. Construction activities at the site of the proposed action would include non-native plant species removal that would be replaced with native riparian and upland vegetation and upland seeding, and the implementation of the proposed action including the installation of a staging area, temporary access routes and the 5,000-gallon water tank. The operation of each piece of off-road equipment would not be constant throughout the day, as equipment would be turned off when not in use. The noise levels generated during construction of the proposed action would vary, reaching a maximum with use of a forklift (maximum noise level of 78 dB at 100 feet), which results in an hourly L_{eq} of approximately 72 dBA and is less than the FEIR threshold of hourly L_{eq} level of 90 dBA during the day. The proposed action would not result in new or substantially more severe significant ambient noise impacts during construction. The operation and maintenance activities at the site of the proposed action would include maintenance of a temporary irrigation system over a period of three to five years to support successful establishment of the native riparian and upland plantings. These activities would be

temporary and occur infrequently throughout the year. Unlike during construction of the proposed action, it is unlikely that multiple pieces of noise-generating maintenance equipment would be operating at any one place concurrently. The proposed action would not result in new or substantially more severe significant ambient noise impacts during operation.

There are no public airports or private airstrips near the proposed action. The proposed action would not result in the placement of workers in areas where they would be exposed to excessive noise levels associated with airports or airstrips. Therefore, the proposed action would not result in new or substantially more severe significant impacts related to the exposure of people to excess noise due to proximity to an airport or private airstrip.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to noise and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise.

3.3.14 Population and Housing

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
14. Population and Housing. Would the Project:					
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	p. 4.12-7	No	No	No	N/A
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	p. 4.12-7	No	No	No	N/A
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	p. 4.12-7	No	No	No	N/A

Findings of FEIR

The FEIR determined that due to the nature of the SAFRR project it would not induce substantial population growth or conflict with housing and population projections and policies, and that the SAFRR project would generally reduce flood risk in developed areas, a less-than-significant impact.

Discussion

The proposed action would convert existing grassland areas to riparian habitat adjacent to San Geronimo Creek and expand and enhance the existing riparian corridor; it would not construct housing and therefore would not directly induce growth in the area of the proposed action. Therefore, the proposed action would not result in new or substantially more severe significant impacts related to this topic.

The proposed action would convert existing grassland areas to riparian and upland habitat adjacent to San Geronimo Creek and expand and enhance the existing riparian corridor; it would not displace any housing and therefore would not necessitate construction of replacement housing. Therefore, the proposed action would not displace substantial numbers of existing housing units or people and would not result in new or substantially more severe significant impacts related to this topic.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to population and housing and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to population and housing.

3.3.15 Public Services

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
15. Public Services.					
Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any the public services:					
Fire protection?	p. 4.13-9	No	No	No	N/A
Police protection?	p. 4.13-9	No	No	No	N/A
Schools?	p. 4.13-9	No	No	No	N/A
Parks?	p. 4.13-9	No	No	No	N/A
Other public facilities?	p. 4.13-9	No	No	No	N/A

Findings of FEIR

The FEIR determined that SAFRR project construction would not result in a substantial increase in the local population and project operation would not result in any permanent increase in the local population, and therefore that the impact of construction and operation of the SAFRR project on public services would be less than significant.

Discussion

Construction

Construction activities for the proposed action would occur over a period of 6 weeks at each site and would employ no more than 20 to 30 construction workers, same as the construction activities discussed in the San Anselmo Flood Risk Reduction FEIR (2018). Construction workers would likely come from within Marin County and other Bay Area counties. Construction workers who are residents of Marin County are currently being served by the existing county and individual city/town services, and thus would not represent an increase in demand for these services. While it is possible that some workers might temporarily relocate from other areas, the proposed action is not expected to result in a substantial increase in the local population and thus not expected to result in increased response times such that new or physically alter facilities would be required to maintain service. Incidents could occur during construction requiring law enforcement, fire protection, or emergency medical services. However, this analysis presumes that any incremental increase in demand for these services during construction would be temporary, could be accommodated by existing services, and would not require construction of new or physically altered facilities to maintain service. Therefore, the proposed action would not result in new or substantially more severe significant impacts related to this topic.

Operation

The proposed action does not involve the construction of residences or businesses and would not result in increased maintenance staff, consequently, the proposed action would not result in a permanent increase in the local population. The proposed action would not affect existing governmental facilities. Operation of the proposed action would not require new or physically altered governmental facilities, and the proposed action would not result in new or substantially more severe significant impacts related to this topic.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to public services and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to public services.

3.3.16 Recreation

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
16. Recreation.					
a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	p. 4.14-11	No	No	No	N/A
b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	p. 4.14-12	No	No	No	N/A

Findings of FEIR

The FEIR determined that the SAFRR project would have less-than-significant impacts related to recreation because the closure of recreational facilities for use by project construction would be temporary and would not increase the use of other recreational facilities such that substantial physical deterioration of those facilities would occur. The FEIR also determined that the SAFRR project’s recreational facility improvements would not have adverse physical effects on the environment beyond the effects identified in other sections of the EIR, and that the SAFRR project would have no impact related to the need for additional parkland or conformance with park standards because it would not eliminate parkland.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. The site parcel of the proposed action is zoned for Resort and Commercial Recreation and operated as a golf course until 2017. In 2018 the site was sold, and in 2021 construction of a fish passage and off-channel habitat restoration project was completed in and along San Geronimo Creek near the proposed action. The landscape adjacent to the proposed action is an open meadow with existing walking paths (former golf course cart paths). Future uses anticipated on the parcel would be limited to passive recreation such as walking, jogging, and birdwatching.

Construction and operation at the site of the proposed action would not create new housing or other development that would increase the area’s population or otherwise place additional burdens on local or regional recreational facilities. As such, the net use of existing recreational facilities would not be affected, and the proposed action would not result in new or substantially more severe significant impacts related to this topic.

The proposed action would not include recreational facilities or require the construction or expansion of recreational facilities that could have an adverse effect on the environment. The proposed action would be consistent with future passive recreational uses anticipated for the surrounding parcel. As such, the proposed action would not result in new or substantially more severe significant impacts related to this topic.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to recreation and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to recreation.

3.3.17 Transportation/Traffic

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
17. Transportation/Traffic. Would the Project:					
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	No impact of this kind was identified in the FEIR	No	No	No	N/A
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	No impact of this kind was identified in the FEIR	No	No	No	N/A
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	p. 4.15-9	No	No	No	N/A
e. Result in inadequate emergency access?	No impact of this kind was identified in the FEIR	No	No	No	N/A

Findings of FEIR

The FEIR determined that construction activity associated with the SAFRR project could temporarily affect vehicle or transit circulation, impede access for emergency vehicles, have an adverse effect on pedestrian and bicycle safety, and temporarily increase traffic safety hazards due to incompatible uses. The FEIR determined that implementation of Mitigation Measure 4.15-1: Traffic Management Plan, reduces these construction impacts to less than significant levels. The FEIR determined that SAFRR project operation would not have significant transportation impacts because it would not alter existing roadway features.

Discussion

Setting

The proposed action is not within the geographic areas analyzed in the FEIR. San Geronimo Valley Road and Sir Francis Drake Boulevard are a Class 3 Bikeways (Bike Route) in the vicinity of the proposed action. Bike routes are intended to provide continuity to the bikeway system and are shared facilities, either with motor vehicles on the street or with pedestrians on sidewalks. Marin County Transit District routes 625 (Lagunitas-Sir Francis Drake HS-San Rafael) and 68 (West Marin Stagecoach) pass the site of the proposed action on San Geronimo Valley Road (MarinMap, 2023).

With respect to Issue b), the FEIR did not evaluate consistency with CEQA Guidelines Section 15064.3, Subdivision (b), as that issue was introduced as part of the December 2018

update to the CEQA Guidelines, which occurred after the FEIR was certified. With the changes to the State CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. The VMT impacts of the proposed action are, therefore, analyzed below.

Impact Discussion

The proposed action would not directly or indirectly eliminate existing or planned alternative transportation corridors or facilities (such as bike paths, lanes, or bus turnouts). In addition, the proposed action would not include changes in policies or programs that support alternative transportation, and it would not construct facilities in locations in which future alternative transportation facilities are planned. No new or more severe environmental impacts related to conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would result from the proposed action.

As discussed above in *Setting*, the FEIR did not evaluate whether the SAFRR Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), as the issue was introduced as part of the December 2018 update to the current *CEQA Guidelines*, which occurred after the FEIR was certified. Section 15064.3 of the CEQA Guidelines suggests that the analysis of VMT impacts applies mainly to land use and transportation projects. The Governor's Office of Planning and Research "Technical Advisory on Evaluating Transportation Impacts in CEQA" guidance document recommends a "screening threshold" to quickly identify when a project should be expected to cause only a less-than-significant impact, without conducting a detailed study: projects that generate or attract fewer than 110 new vehicle trips per day generally may be assumed to cause a less-than-significant transportation impact. The proposed action would restore riparian and upland habitat and would not generate or attract new vehicle trips. Furthermore, impacts due to construction activities would be temporary and would not result in any meaningful long-term or permanent change in VMT. Per this statewide and local guidance, since the proposed action is neither a land use nor a transportation project and meets the Small Infill Projects exemption, it can be assumed to have a less than significant impact with respect to VMT. The proposed action would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact of this kind.

The proposed action would not include new design features for any roadways (e.g., new facilities or obstructions within public roadways) or alterations of existing features (e.g., road realignment). Construction staging and activities would occur within the site of the proposed action, and the proposed action would require one-time deliveries of plants and a water tank to the site. There would be no change to lane or roadway configuration as part of the proposed action. No new or more severe environmental impacts related to traffic safety would result from implementation of the proposed action.

The proposed action would not result in new or more severe adverse impacts related to emergency access because the proposed action would not lead to any long-term changes in emergency access and would not impede any roadways or public rights of way important for emergency access. Given the small scope of the proposed action and the limited potential for increased roadway demand, the proposed action would not be sufficient to result in inadequate

emergency access. No new or more severe environmental impacts related to emergency access would result from the proposed action.

The only cumulative project in the vicinity, the 2017 Fisheries Habitat Restoration Project Subsequent Creek Permit, Design Review, and Tree Removal Permit, was completed in 2021 and does not include land uses that generate traffic. Therefore, there would be no new or substantially more severe significant cumulative transportation impacts to which the proposed action would contribute.

Mitigation Measures

Mitigation measures applicable to the San Anselmo Flood Risk Reduction Project are listed in Appendix A, San Anselmo Flood Risk Reduction Project Mitigation Monitoring and Reporting Program. None of the adopted Transportation and Circulation mitigation measures are applicable to the Project.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to transportation and traffic and no mitigation measures are required. The changed circumstance of a change in the focus of transportation impact analysis under CEQA, from LOS to VMT, has been considered; the proposed action would not result in a new significant impact from an increase in VMT. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to transportation and traffic.

3.3.18 Utilities and Service Systems

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
18. Utilities and Service Systems. Would the Project:					
a. Require or result in the relocation or construction of new or expanded water, wastewater or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	p. 4.13-17	No	No	No	N/A
b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	p. 4.13-18	No	No	No	N/A
e. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	p. 4.13-18	No	No	No	N/A
f. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	p. 4.13-20	No	No	No	N/A
g. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	p. 4.13-21	No	No	No	N/A

Findings of FEIR

The FEIR determined that the SAFRR project would have less-than-significant impacts related to utilities and service systems because the SAFRR project's demand for solid waste would be within capacity of nearby landfills, the SAFRR project would comply with regulations and statutes regarding solid waste, and the SAFRR project would not require construction of new utilities.

Discussion

The proposed action is not within the geographic areas analyzed in the FEIR. As discussed in Section 3.3.11, the site of the proposed action operated as a golf course until 2017, and future uses

anticipated on the parcel would be limited to passive recreation. Surrounding land uses include single family residences to the south and west, recreational and open space areas to the north across Sir Francis Drake Boulevard, and the San Geronimo Treatment Plant to the east. Existing utilities at the site of the proposed action consist of an overhead power line and existing irrigation line.

The existing utilities at the site would not need to be relocated to construct the proposed action. The proposed action would not generate wastewater and would not create new impervious area. Operation of the proposed action would not require to use of new electric power, natural gas, or telecommunications facilities. No new or more severe environmental impacts related to construction or expansion of utilities would result from the proposed action.

The proposed action would source irrigation water from an existing active groundwater well with sufficient flow available to support the proposed vegetation. Use of the groundwater would be temporary and sufficient to supply the mitigation planting. No additional water supply, and no operations phase water supply, would be required and therefore no new or more severe environmental impacts related to water supply would result from the proposed action.

All spoils generated from the installation of trees and plants will be distributed and spread uniformly throughout the site of the proposed action, and therefore would not require off-hauling to a landfill and would not need to comply with solid waste regulations. Operation of the proposed action would not generate solid waste. No new or more severe environmental impacts related to solid waste would result from the proposed action.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to utilities and service systems and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to utilities and service systems.

3.3.19 Wildfire

Environmental Issue Area	Where Impact Was Analyzed in FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
19. Wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:					
a. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Topic not addressed in FEIR	No	No	No	N/A
b. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Topic not addressed in FEIR	No	No	No	N/A
c. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Topic not addressed in FEIR	No	No	No	N/A
d. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Topic not addressed in FEIR	No	No	No	N/A

Findings of FEIR

The FEIR, Section 4.8, Hazards and Hazardous Materials, Impact 4.8-2, addressed the potential for the SAFRR project to increase wildfire hazards, and determined that the impact was less than significant. See further discussion of potential wildfire hazards of the current proposed action in Section 3.3.9, Hazards and Hazardous Materials.

Discussion

In 2012, Senate Bill 1241 was passed, requiring the Governor’s Office of Planning and Research, the Natural Resources Agency, and the California Department of Forestry and Fire Protection (Cal FIRE) to develop amendments to the initial study checklist of the State CEQA Guidelines for the inclusion of questions related to fire hazard impacts for projects located on lands classified as state responsibility areas, and on lands classified as very high fire hazard severity zones (FHSZs) (Governor’s Office of Planning and Research, 2017). The additions to the Checklist implementing

SB 1241 were included in the 2019 revisions to the State CEQA Guidelines, Appendix G, which is used as the basis for the topical questions in this Supplemental Environmental Review.

In accordance with California Public Resource Code Sections 4201 through 4204 and Government Code Sections 51175 through 51189, Cal FIRE maps areas of significant fire hazards because of fuels, terrain, weather, and other relevant factors. Cal FIRE's statewide and county maps (adopted November 2007) depict FHSZs that are within the State Responsibility Area (SRA). The SRA is the area where the State of California is financially responsible for the prevention and suppression of wildfires. The areas within the SRA are further classified as being Moderate, High, or Very High FHSZs. The site of the proposed action is within an SRA and mapped as a Moderate FHSZ (CAL FIRE, 2022; Marin County, 2023).

Marin County also designates lands within the Wildland-Urban Interface (WUI), per Marin County Code Section 16.17.080. The site of the proposed action is within the mapped WUI (Marin County, 2023), however, the proposed action would not create new structures within the WUI.

The proposed action would restore and enhance riparian habitat along San Geronimo Creek and would not construct housing or any other structures or induce population growth. The proposed action would not require construction of infrastructure to serve the proposed action, or necessary to protect the area from wildfire hazards. The proposed action is located in a relatively flat area. As discussed in Section 3.3.9, Hazards and Hazardous Materials, use of construction equipment would be subject to the California Public Resources Code, which includes fire safety regulations that apply to state responsibility areas during the time of year designated as having hazardous fire conditions. For these reasons the proposed action would not cause significant impacts related to items 19a through 19d. The proposed action would not have a new or substantially more severe significant impact related to wildfire.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to wildfire and no mitigation measures are required. The changed circumstance of impact thresholds based on the State CEQA Guidelines Appendix G (Environmental Checklist) questions has been considered; the proposed action would not result in a new significant impact related to wildfire due to the changed circumstance. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to wildfire.

3.3.20 Mandatory Findings of Significance

Environmental Issue Area	Where Impact Was Analyzed in the FEIR.	Do Proposed Changes in the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	Do Previously Adopted FEIR Mitigation Measures Address/Resolve Impacts?
20. Mandatory Findings of Significance.					
a. Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Sections 4.5, Biological Resources; 4.6, Cultural Resources; and 4.7, Geology and Soils	Yes	No	No	No, see Mitigation Measure CUL-1
b. Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when view in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?	Chapter 5, Growth-Inducing and Cumulative Effects	No	No	No	N/A
c. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Chapter 4, Environmental Setting, Impacts, and Mitigation Measures; Chapter 5, Growth-Inducing and Cumulative Effects	No	No	No	N/A

Discussion

This environmental checklist and the FEIR provide a comprehensive discussion of the potential for the SAFRR project and the proposed action to affect the quality of the environment. Specifically, topic 3.3.4, Biological Resources, discusses the potential for the proposed action to substantially affect habitats, fish/wildlife populations, and sensitive natural communities. As discussed, all impacts related to biological resources would be less than significant, or less than significant with mitigation. Topic 3.3.5, Cultural Resources and Tribal Cultural Resources discusses the potential for the proposed action to affect important examples of California history. As discussed, all impacts related to cultural resources would be less than significant, or less than significant with mitigation. Topics 3.3.5, Cultural Resources and Tribal Cultural Resources and 3.3.7, Geology and Soils, discuss the potential for the proposed action to affect important

examples of California prehistory. As discussed, all impacts on archeological resources and paleontological resources would be less than significant with implementation of mitigation.

The proposed action in combination with the past, present and reasonably foreseeable projects, including remaining SAFRR project construction, as discussed in Section 3.3, *Environmental Checklist*, would not result in significant cumulative impacts.

Potential adverse effects on human beings have been considered as a part of the analysis of individual environmental topics in this environmental checklist. As discussed above, the proposed action would not adversely affect human beings with implementation of mitigation. The FEIR assesses this topic and identifies mitigation measures where applicable.

Mitigation Measures

None.

Conclusion

The size and geographic location of the proposed action (which is required pursuant to the FEIR and other permits for the SAFRR project) were not known at the time of FEIR certification; as discussed above, the proposed action would not result in new significant impacts related to mandatory findings of significance and no mitigation measures are required. Therefore, the proposed action would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to mandatory findings of significance.

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CHAPTER 4

Summary and Conclusion

4.1 Summary Findings of Checklist

Table 3 provides a summary of the conclusions for each environmental topic reached in Chapter 3, Checklist for Supplemental Environmental Review. The table indicates for each topic whether the proposed action would result in a new significant impact or a substantially more severe significant impact than identified in the FEIR, and if so, whether existing or revised mitigation measures would reduce the impact to less than significant. Those topical issue areas for which there is the potential for a significant impact that cannot be mitigated should be further evaluated in a subsequent EIR, pursuant to State CEQA Guidelines Section 15162, or a supplement to the FEIR, pursuant to State CEQA Guidelines Section 15163. As shown in the table, the proposed action would not result in a new or substantially more severe significant impact, and an addendum to the FEIR may be prepared, pursuant to State CEQA Guidelines Section 15164.

**TABLE 3
CONCLUSIONS REGARDING NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT EFFECTS**

Topical Issue	No New or Substantially More Severe Significant Impact	New or Substantially More Severe Significant Impact, Can Be Mitigated to Less Than Significant	New or Substantially More Severe Significant Impact, Cannot Be Mitigated to Less Than Significant
Aesthetics	X		
Agriculture	X		
Air Quality		X	
Biological Resources		X	
Cultural Resources and Tribal Cultural Resources	X		
Energy	X		
Geology and Soils	X		
Greenhouse Gas Emissions	X		
Hazards and Hazardous Materials	X		
Hydrology and Water Quality	X		
Land Use and Planning	X		
Mineral Resources	X		
Noise	X		
Population and Housing	X		
Public Services	X		

TABLE 3 (CONTINUED)
CONCLUSIONS REGARDING NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT EFFECTS

Topical Issue	No New or Substantially More Severe Significant Impact	New or Substantially More Severe Significant Impact, Can Be Mitigated to Less Than Significant	New or Substantially More Severe Significant Impact, Cannot Be Mitigated to Less Than Significant
Recreation	X		
Transportation and Traffic	X		
Utilities and Service Systems	X		
Wildfire	X		
Mandatory Findings of Significance	X		

4.2 Mitigation Measures

This section compiles mitigation measures included in the FEIR that are applicable to the proposed action. No changes to the mitigation measures from the FEIR are required. All mitigation measures are included in Appendix A, San Anselmo Flood Risk Reduction Project Mitigation Monitoring and Reporting Program.

Adopted Mitigation Measure 4.3-1: BAAQMD Basic Construction Measures.

To limit dust, criteria pollutants, and precursor emissions associated with construction, the following BAAQMD-recommended Basic Construction Measures shall be implemented and included in all contract specifications for components constructed under the Project:

- 1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- 2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- 3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- 4) All vehicle speeds on unpaved roads shall be limited to 15 mph.
- 5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- 6) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- 7) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

- 8) Post a publicly visible sign with the telephone number and person to contact at the Flood Control District regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Adopted Mitigation Measure 4.3-4: Tier 4 Engines for Construction Equipment.

All off-road equipment greater than 25 horsepower that operates for more than 20 total hours over the entire duration of construction activities shall have engines that meet the USEPA or CARB Tier 4 interim or Tier 4 Final off-road emission standards.

Adopted Mitigation Measure 4.5-2: Avoid Impacts to Rare Plants.

A qualified biologist shall conduct a pre-construction survey of each Project site for special-status plant species with the potential to occur within the area of disturbance. The survey shall be floristic in nature and shall follow the procedures outlined in the CDFW Publication *Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities* (CDFW, 2009). The survey shall be conducted between April and July in conjunction with the blooming seasons of those rare plants with moderate potential to occur in the Project area.

If no special-status plants are observed during appropriately timed surveys by a qualified botanist, it is assumed the construction activity will have no impact on special-status plants and no further action is required.

If special-status plants are identified within the Project area, the individuals or populations shall be mapped and quantified and reported to the CNDDDB, and the project manager shall be notified so that potential impacts to these known occurrences shall be avoided, when feasible. Coordination with CDFW and/or USFWS staff shall be conducted to establish appropriate avoidance and minimization measures if the species is federally or State listed. Avoidance and minimization measures may include:

- 1) No-disturbance buffers.
- 2) Work windows for low impact activities that are compatible with the dormant phase of a special-status plant life cycle but that may kill living plants or severely alter their ability to reproduce.
- 3) Silt fencing or construction fencing to prevent vehicles, equipment, and personnel from accessing the occupied habitat.
- 4) Erosion control BMPs such as straw wattles made of rice straw, erosion control blankets, or hydroseeding with a native plant seed mix to prevent sedimentation from upslope construction activities.
- 5) Before the construction activity commences, special-status plant occurrences shall be marked with pin flags in the field, and all maintenance personnel shall be instructed as to the location and extent of the special-status plants or populations and the importance of avoiding impacts to the species and its habitat.
- 6) If needed a qualified biologist shall be present or on-call during construction activities to provide guidance on avoiding special-status plants, ensure that other

avoidance measures (buffers, fencing, etc.) are observed, and to document the total impact of the maintenance activity, particularly if it is greater or less than anticipated.

- 7) In consultation with, and as authorized by, CDFW or USFWS, a qualified botanist may collect and spread seeds or relocate plants to appropriate locations.

Adopted Mitigation Measure 4.5-3b: Avoid Impacts to California Red-legged Frog and Western Pond Turtle.

The name(s) and credentials of the qualified biologist(s) to act as construction monitors shall be submitted to the USFWS for approval at least 15 days before construction work begins.

Prior to commencing work, an approved biologist shall survey the entire construction footprint for California red-legged frog and other special-status species with potential to be present, such as western pond turtle.

At the beginning of each workday that includes initial ground disturbance, including grading, excavation, and vegetation-removal activities, an approved biologist shall conduct on-site monitoring for the presence of these species in the area where ground disturbance or vegetation removal is planned. If required by the USFWS or CDFW, perimeter fences shall be inspected to ensure they do not have any tears or holes, that the bottoms of the fences are still buried, and that no individuals have been trapped in the fence.

All excavated or deep-walled holes or trenches greater than 2 feet deep shall be covered at the end of each workday using plywood, steel plates, or similar materials, or escape ramps shall be constructed of earth fill or wooden planks to allow animals to exit. Before such holes are filled, they shall be thoroughly inspected for trapped animals.

If a special-status species is present within the exclusion fence area during construction, work shall cease in the vicinity of the animal, and the animal shall be allowed to relocate of its own volition unless relocation is permitted by state and/or federal regulatory agencies.

The contractor shall maintain the temporary fencing—both exclusion fencing and protective fencing (if installed)—until all construction activities are completed. No construction activities, parking, or staging shall occur beyond the fenced exclusion areas.

Adopted Mitigation Measure 4.5-4: Avoid Impacts to Special-status and Nesting Birds, including Raptors and Northern Spotted Owls.

Tree removal activities shall be avoided during the nesting season (February 1 to August 31). Prior to any tree removal or construction in nesting season, a qualified biologist shall conduct a spotted owl and general nesting bird survey in each Project site and areas within 1/2-mile. Any identified spotted owl nesting areas or activity centers shall be flagged and avoided with a buffer of 1/4-mile throughout the active nesting season. Other nesting birds with active nests in the vicinity of the construction area shall be avoided by a buffer of 50 feet, or as determined in coordination with USFWS and CDFW. Construction work may continue outside of the no-work buffer. Northern spotted owl nesting surveys shall be conducted in coordination with Marin County Parks and Point Blue Conservation Science (Point Blue, 2017).

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Appendix A

San Anselmo Flood Risk Reduction Project Mitigation Monitoring and Reporting Program

A Mitigation Monitoring and Reporting Program (MMRP) was adopted at the time the San Anselmo Flood Risk Reduction Project was approved by the Marin County Flood Control and Water Conservation District Board of Supervisors in September 2018. The purpose of the MMRP is to ensure that the mitigation measures, which are necessary to reduce identified significant impacts to less than significant, are implemented in a timely and effective manner.

While the full MMRP is provided below, only a subset of the measures (identified in Section 4.2, Mitigation Measures) would apply to the proposed action discussed in this document.

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**TABLE A-1
MITIGATION, MONITORING, AND REPORTING PROGRAM**

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.3 Air Quality and Greenhouse Gas Emissions					
<p>Impact 4.3-1: Construction of the Project would generate criteria pollutant emissions that could exceed air quality standards or contribute substantially to an existing or projected air quality violation.</p>	<p>Mitigation Measure 4.3-1: BAAQMD Basic Construction Measures To limit dust, criteria pollutants, and precursor emissions associated with construction, the following BAAQMD-recommended Basic Construction Measures shall be implemented and included in all contract specifications for components constructed under the Project:</p> <ol style="list-style-type: none"> All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. All vehicle speeds on unpaved roads shall be limited to 15 mph. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. Post a publicly visible sign with the telephone number and person to contact at the Flood Control District regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. 	<p>Marin County Flood Control and Water Conservation District (Flood Control District)/Contractor</p>	<p>During construction</p>		
<p>Impact 4.3-2: Construction of the Project would result in emissions that could conflict with the 2017 Clean Air Plan.</p>	<p>See Mitigation Measure 4.3-1, above.</p>	<p>Flood Control District/Contractor</p>	<p>During construction</p>		
<p>Impact 4.3-4: Construction of the Project could expose sensitive receptors to toxic air contaminants, including diesel particulate matter emissions.</p>	<p>Mitigation Measure 4.3-4: Tier 4 Engines for Construction Equipment All off-road equipment greater than 25 horsepower that operates for more than 20 total hours over the entire duration of construction activities shall have engines that meet the USEPA or CARB Tier 4 interim or Tier 4 Final off-road emission standards.</p>	<p>Flood Control District/Contractor</p>	<p>During construction</p>		
4.4 Energy, Mineral, Forest and Agricultural Resources					
<p>Impact 4.4-1: Implementation of the Project could use energy, oil, or natural gas in an inefficient manner; encourage activities that would result in the use of large amounts of energy, oil, or natural gas; result in the energy supplier not having the capacity to supply the Project's energy needs with existing or planned supplies; or require the development of new energy resources.</p>	<p>See Mitigation Measure 4.3-1, above.</p>	<p>Flood Control District/Contractor</p>	<p>During construction</p>		
4.5 Biological Resources					
<p>Impact 4.5-1: Project implementation could have substantial adverse effects on special-status aquatic species or habitats.</p>	<p>Mitigation Measure 4.5-1a: Seasonal Avoidance of Sensitive Aquatic Species In-water construction work, including activities on the banks that are expected to create turbidity or disturb the streambed, shall be conducted within resource agency-approved work windows intended to reduce potential impacts on salmonids (generally limiting work to the period between June 15 and October 15) with resource agency concurrence for the following exceptions:</p> <ol style="list-style-type: none"> Removal of debris, foundations or other manmade materials from the creek bed may continue year-round, in areas of the stream which are dry and where such activity shall not create turbidity. Tree removal and invasive species removal may take place year-round, providing the area is free of nesting birds and roosting bats as provided under Mitigation Measure 4.5-4. Revegetation activities may occur year-round. 	<p>Flood Control District/Contractor</p>	<p>During construction</p>		

TABLE A-1 (CONTINUED)
MITIGATION, MONITORING, AND REPORTING PROGRAM

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.5 Biological Resources (cont.)					
<p>Impact 4.5-1 (cont.)</p>	<p>Mitigation Measure 4.5-1b: Relocation of Special-Status Fish</p> <p>If in-channel work requires dewatering, including for sediment removal maintenance activities, fish shall be captured and relocated downstream of the Project areas to avoid injury and mortality and minimize disturbance. The Flood Control District shall implement the measures below, or whatever more stringent species preservation and avoidance measures are imposed by resource agencies, including NMFS and CDFW, with jurisdiction over aquatic special-status species.</p> <ol style="list-style-type: none"> 1. The name(s) and credentials of qualified biologist(s) to act as construction monitors shall be submitted to CDFW and NMFS for approval at least 15 days before construction work begins. 2. Prior to and during the initiation of construction activities, qualified fisheries biologist (i.e., approved by CDFW and/or NMFS) shall be present during installation and removal of creek diversion structures. 3. For sites that require flow diversion and exclusion, the work area shall be blocked by placing fine-meshed nets or screens above and below the work area to prevent salmonids from re-entering the work area. To minimize the potential for re-entry, mesh diameter shall not exceed 1/8 inch. The bottom edge of the net or screen shall be secured to the channel bed to prevent fish from passing under the screen. Exclusion screening shall be placed in low velocity areas to minimize fish impingement against the mesh. Screens shall be checked periodically and cleaned of debris to permit free flow of water. 4. Before removal and relocation on individual fish begins, a qualified fisheries biologist shall identify the most appropriate release location(s). In general, release locations should have water temperatures similar to (<3.6°F difference) the capture location and offer ample habitat (e.g., depth, velocity, cover, connectivity) for released fish, and should be selected to minimize the likelihood of reentering the work area or becoming impinged on exclusion nets or screens. 5. The means of capture shall depend on the nature of the work site, and shall be selected by a qualified fisheries biologist as authorized by CDFW and NMFS. Complex stream habitat may require the use of electrofishing equipment, whereas in outlet pools, fish and other aquatic species may be captured by pumping down the pool and then seining or dip netting. Electrofishing, if necessary, shall be conducted only by properly trained personnel holding current permits from CDFW and NMFS and following the most recent NMFS electrofishing guidelines (NMFS, 2000). 6. Initial fish relocation efforts shall be performed several days prior to the scheduled start of construction. Flow diversions and species relocation shall be performed during morning periods. The fisheries biologist shall survey the exclusion screening throughout the diversion effort to verify that no special-status fish, amphibians, or aquatic invertebrates are present. Afternoon pumping activities shall be limited and pumping shall be suspended when water temperatures exceed 18 degrees Celsius (64.5° F). Water temperatures shall be measured periodically, and flow diversion and species relocation shall be suspended if temperatures exceed the 18-degree limit under NMFS guidelines. Handling of fish shall be minimized. When handling is necessary, personnel shall wet hands or nets before touching them. 7. Prior to translocation, fish that are collected during surveys shall be temporarily held in cool, aerated, shaded water using a five-gallon container with a lid. Overcrowding in containers shall be avoided; at least two containers shall be used and no more than 25 fish shall be kept in each bucket. Aeration shall be provided with a battery-powered external bubbler. Fish shall be protected from jostling and noise, and shall not be removed from the container until the time of release. A thermometer shall be placed in each holding container and partial water changes shall be conducted as necessary to maintain a stable water temperature. Special-status fish shall not be held more than 30 minutes. If water temperature reaches or exceeds 18 degrees Celsius (USFWS 2012), the fish shall be released and relocation operations shall cease. 8. If fish are abundant, capture shall cease periodically to allow release and minimize the time fish spend in holding containers. 9. Fish shall not be anesthetized or measured. However, they shall be visually identified to species level, and year classes shall be estimated and recorded. 10. Reports on fish relocation activities shall be submitted to CDFW and NMFS in within one week. 	<p>Qualified Fisheries Biologist (construction monitoring; fish relocation); Qualified Fisheries Biologist (reporting)</p>	<p>Prior to and during construction; during construction</p>		
	<p>Mitigation Measure 4.5-1c: Contractor Environmental Awareness Training and Site Protection</p> <p>All construction personnel that are working in areas of potential endangered species habitat shall attend an environmental education program delivered by a qualified biologist prior to working on either Project site. The training shall include an explanation as how to best avoid the accidental take of special-status species, including salmonids and other fish species, western pond turtle, California red-legged frog, and listed birds.</p> <p>The training session shall be mandatory for contractors and all construction personnel. The field meeting shall include topics on species identification, life history, descriptions, and habitat requirements during various life stages. Emphasis shall be placed on the importance of the habitat and life stage requirements within the context of maps showing areas where minimization and avoidance measures are being implemented. The program shall include an explanation of appropriate federal and state laws protecting endangered species.</p> <p>The contractor shall provide closed garbage containers for the disposal of all trash items (e.g., wrappers, cans, bottles, food scraps). Work sites shall be cleaned of litter before closure each day, and placed in wildlife-proof garbage receptacles. Construction personnel shall not feed or otherwise attract any wildlife. No pets, excluding service animals, shall be allowed in construction areas.</p>	<p>Qualified Biologist/ Construction Monitor (training); Contractor (garbage containers, litter removal)</p>	<p>Prior to construction</p>		

**TABLE A-1 (CONTINUED)
MITIGATION, MONITORING, AND REPORTING PROGRAM**

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.5 Biological Resources (cont.)					
<p>Impact 4.5-2: Project implementation could have substantial adverse effects on special-status plants.</p>	<p>Mitigation Measure 4.5-2: Avoid Impacts to Rare Plants</p> <p>A qualified biologist shall conduct a pre-construction survey of each Project site for special-status plant species with the potential to occur within the area of disturbance. The survey shall be floristic in nature and shall follow the procedures outlined in the CDFW Publication <i>Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities</i> (CDFW, 2009). The survey shall be conducted between April and July in conjunction with the blooming seasons of those rare plants with moderate potential to occur in the Project area.</p> <p>If no special-status plants are observed during appropriately timed surveys by a qualified botanist, it is assumed the construction activity will have no impact on special-status plants and no further action is required.</p> <p>If special-status plants are identified within the Project area, the individuals or populations shall be mapped and quantified and reported to the CNDDDB, and the project manager shall be notified so that potential impacts to these known occurrences shall be avoided, when feasible. Coordination with CDFW and/or USFWS staff shall be conducted to establish appropriate avoidance and minimization measures if the species is federally or State listed. Avoidance and minimization measures may include:</p> <ol style="list-style-type: none"> 1) No-disturbance buffers. 2) Work windows for low impact activities that are compatible with the dormant phase of a special-status plant life cycle but that may kill living plants or severely alter their ability to reproduce. 3) Silt fencing or construction fencing to prevent vehicles, equipment, and personnel from accessing the occupied habitat. 4) Erosion control BMPs such as straw wattles made of rice straw, erosion control blankets, or hydroseeding with a native plant seed mix to prevent sedimentation from upslope construction activities. 5) Before the construction activity commences, special-status plant occurrences shall be marked with pin flags in the field, and all maintenance personnel shall be instructed as to the location and extent of the special-status plants or populations and the importance of avoiding impacts to the species and its habitat. 6) If needed a qualified biologist shall be present or on-call during construction activities to provide guidance on avoiding special-status plants, ensure that other avoidance measures (buffers, fencing, etc.) are observed, and to document the total impact of the maintenance activity, particularly if it is greater or less than anticipated. 7) In consultation with, and as authorized by, CDFW or USFWS, a qualified botanist may collect and spread seeds or relocate plants to appropriate locations. 	<p>Qualified Biologist</p>	<p>Prior to construction; during construction</p>		
<p>Impact 4.5-3: Project implementation could have substantial adverse effects on special-status amphibians.</p>	<p>Mitigation Measure 4.5-3a: Install Wildlife Exclusion Fencing</p> <p>The Flood Control District shall implement the measures below, or whatever more stringent California red-legged frogs (CRLF) and western pond turtle (WPT) preservation and avoidance measures are imposed by resource agencies with primary jurisdiction over special-status wildlife species, including USFWS and CDFW.</p> <ol style="list-style-type: none"> 1) Before ground-disturbing activity occurs, the contractor shall install temporary exclusion/silt barrier fencing around the perimeter of the construction site. Fencing shall be installed to the extent necessary to exclude CRLF from the construction area (in areas with habitat), and minimize impacts to natural habitat. Fencing material shall provide for wildlife exclusion as well as maintenance of water quality. Construction personnel and construction activity shall avoid areas outside the fencing. The need for and exact location of the fencing shall be determined by a qualified biologist, with the goal of protecting sensitive biological habitat and water quality. The fencing shall be checked at regular intervals (e.g., weekly) and maintained until construction is complete at individual work sites. The fence shall contain exit funnels to allow any wildlife within the construction area to leave without human intervention while preventing entry into the construction zone. Exit funnels shall be placed at ground level no more than 100 feet apart along the fence, or as modified by a qualified biologist or as directed by resource agencies with primary jurisdiction over special-status wildlife species. 2) The fencing shall be monitored as prescribed in Mitigation Measure 4.5-6. 	<p>Flood Control District/ Contractor (installation); Qualified Biologist (fence inspection/monitoring)</p>	<p>Prior to construction; during construction</p>		
	<p>Mitigation Measure 4.5-3b: Avoid Impacts to California Red-legged Frog and Western Pond Turtle</p> <p>The name(s) and credentials of the qualified biologist(s) to act as construction monitors shall be submitted to the USFWS for approval at least 15 days before construction work begins.</p> <p>Prior to commencing work, an approved biologist shall survey the entire construction footprint for California red-legged frog and other special-status species with potential to be present, such as western pond turtle.</p> <p>At the beginning of each workday that includes initial ground disturbance, including grading, excavation, and vegetation-removal activities, an approved biologist shall conduct on-site monitoring for the presence of these species in the area where ground disturbance or vegetation removal is planned. If required by the USFWS or CDFW, perimeter fences shall be inspected to ensure they do not have any tears or holes, that the bottoms of the fences are still buried, and that no individuals have been trapped in the fence.</p>	<p>Qualified biologist (site surveying); Contractor (trench covering, temporary fencing)</p>	<p>Prior to construction; during construction</p>		

TABLE A-1 (CONTINUED)
MITIGATION, MONITORING, AND REPORTING PROGRAM

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.5 Biological Resources (cont.)					
Impact 4.5-3 (cont.)	<p>All excavated or deep-walled holes or trenches greater than 2 feet deep shall be covered at the end of each workday using plywood, steel plates, or similar materials, or escape ramps shall be constructed of earth fill or wooden planks to allow animals to exit. Before such holes are filled, they shall be thoroughly inspected for trapped animals.</p> <p>If a special-status species is present within the exclusion fence area during construction, work shall cease in the vicinity of the animal, and the animal shall be allowed to relocate of its own volition unless relocation is permitted by state and/or federal regulatory agencies.</p> <p>The contractor shall maintain the temporary fencing—both exclusion fencing and protective fencing (if installed)—until all construction activities are completed. No construction activities, parking, or staging shall occur beyond the fenced exclusion areas.</p>				
Impact 4.5-4: Project implementation could have substantial adverse effects on nesting birds.	<p>Mitigation Measure 4.5-4: Avoid Impacts to Special-status and Nesting Birds, including Raptors and Northern Spotted Owls</p> <p>Tree removal activities shall be avoided during the nesting season (February 1 to August 31). Prior to any tree removal or construction in nesting season, a qualified biologist shall conduct a spotted owl and general nesting bird survey in each Project site and areas within 1/2-mile. Any identified spotted owl nesting areas or activity centers shall be flagged and avoided with a buffer of 1/4-mile throughout the active nesting season. Other nesting birds with active nests in the vicinity of the construction area shall be avoided by a buffer of 50 feet, or as determined in coordination with USFWS and CDFW. Construction work may continue outside of the no-work buffer. Northern spotted owl nesting surveys shall be conducted in coordination with Marin County Parks and Point Blue Conservation Science (Point Blue, 2017).</p>	<p>Flood Control District/ Contractor (scheduling tree removal);</p> <p>Qualified biologist (surveys, monitoring)</p>	Prior to construction; during construction		
Impact 4.5-5: Project implementation could have substantial adverse effects on Northern spotted owls.	<p>See Mitigation Measure 4.5-4, above.</p>	<p>Flood Control District/ Contractor (scheduling tree removal);</p> <p>Qualified biologist (surveys, monitoring)</p>	Prior to construction; during construction		
Impact 4.5-6: Project implementation could have substantial adverse effects on special-status bats.	<p>Mitigation Measure 4.5-6: Avoid Impacts to Special-status Bats</p> <p>Prior to any construction, a qualified bat biologist shall conduct a pre-construction survey for roosting bats in trees to be removed or pruned and structures to be demolished. If no roosting bats are found, no further action is required. If a bat roost is found, the following measures shall be implemented to avoid impacts on roosting bats.</p> <p>If active maternity roosts are found in trees or structures that shall be removed or demolished as part of construction, tree removal or demolition of that structure shall commence before maternity colonies form (generally before March 1) or after young are flying (generally by July 31). Active maternal roosts shall not be disturbed.</p> <p>If a non-maternal roost of bats is found in a tree or structure to be removed or demolished as part of construction, the individuals shall be safely evicted, under the direction of a qualified bat biologist and with approval from CDFW. Removal of the tree or demolition of the structure should occur no sooner than two nights after the initial minor site modification (to alter airflow), under guidance of the qualified bat biologist. The modifications shall alter the bat habitat, causing bats to seek shelter elsewhere after they emerge for the night. On the following day, the tree or structure may be removed, in presence of the bat biologist. If any bat habitat is not removed, departure of bats from the construction area shall be confirmed with a follow-up survey prior to start of construction.</p>	<p>Qualified bat biologist</p>	Prior to construction		
Impact 4.5-7: Project implementation could adversely affect sensitive natural communities.	<p>Mitigation Measure 4.5-7a: Vegetation Protection for Sensitive Natural Communities</p> <p>Prior to start of construction of any Project element, the extent of sensitive natural communities within the work area shall be identified by a qualified botanist or ecologist experienced in the definition and recognition of these communities. The area of impact in sensitive natural communities shall be minimized by siting construction staging and access areas outside the limits of riparian vegetation (as determined during pre-construction surveys) and by utilizing previously-disturbed areas. Before construction begins, the Project engineer and a qualified biologist shall identify locations for equipment and personnel access and materials staging that will minimize riparian vegetation disturbance. When heavy equipment is required, unintentional soil compaction shall be minimized by using equipment with a greater reach, or using low-pressure equipment. Temporary impacts on sensitive natural communities shall be mitigated by revegetation with native species, as required by Mitigation Measure 4.5-7b.</p>	<p>Qualified botanist; Contractor/Engineer</p>	Prior to construction; during construction		
	<p>Mitigation Measure 4.5-7b: Habitat Restoration and Monitoring Plan</p> <p>The Flood Control District shall prepare a Habitat Restoration and Monitoring Plan for restoration following construction activities at both Project sites. The plan shall describe required salvage and replanting protocols prior to and after construction is complete and shall thereby reduce the long-term amount of losses of these natural communities. This plan shall include, but not be limited to, protocols for replanting of vegetation removed prior to or during construction, and management and monitoring of the plants to ensure replanting success pursuant to Marin County's Countywide Plan, Marin County Code, or Code requirements of the Town of San Anselmo, or by any more stringent requirements included in other permits issued for the Project.</p> <p>The plan shall specify monitoring and performance criteria for the species planted, invasive species control criteria, as well as the best time of year for seeding to occur, pursuant to requirements of permits from the various resource agencies with regulatory purview over the Project. Revegetated areas shall be monitored for a five-year period to track progress toward performance criteria.</p>	<p>Flood Control District (Habitat Restoration and Monitoring Plan); Contractor, Qualified Biologist (vegetation salvage)</p>	Prior to construction; After construction		

**TABLE A-1 (CONTINUED)
MITIGATION, MONITORING, AND REPORTING PROGRAM**

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.5 Biological Resources (cont.)					
<p>Impact 4.5-7 (cont.)</p>	<p>Native riparian vegetation that can be propagated by cuttings or easily transplanted such as rushes and sedges within the Project sites shall be salvaged prior to construction and replanted after construction is completed. Areas impacted by construction-related activity shall be replanted or reseeded with native trees, shrubs, and herbaceous perennials and annuals from the watershed under guidance from a qualified biologist. Local plant materials shall be used for revegetation of the disturbed area. The plant materials shall include local cuttings from the local watershed or from adjacent watersheds. This shall ensure that the seeds can be collected during the appropriate season and the container plants shall be of an appropriate size for out-planting. Using local cuttings can reduce the length of this phase.</p> <p>The Habitat Restoration and Monitoring Plan would also address restoration of jurisdictional wetlands and waters. Temporary impacts to wetlands shall be restored onsite with native wetland species under guidance from a qualified biologist. Permanent impacts to jurisdictional wetlands shall be mitigated for by replacement on- or off-site at an equal ratio or whatever more stringent requirements are included in the permits to be issued for the Project.</p> <p>The monitoring plan shall include annual monitoring of restored areas for at least 5 years. The plan shall contain vegetation management protocols, protocols for monitoring replanting success, and an adaptive management plan if success criteria are not being met. The adaptive management plan would include interim thresholds for replanting success and alternative management approaches, such as weed control or additional replanting, to undertake if thresholds are not met.</p>				
	<p>Mitigation Measure 4.5-7c: Avoid Spread of Invasive Species and Pathogens</p> <p>All vehicles and equipment entering each Project site shall be clean of noxious weeds. Noxious weeds could spread between sites as well as from outside the Project sites. All construction equipment shall be washed thoroughly to remove all dirt, plant, and other foreign material prior to entering the Project sites. Particular attention shall be shown to the under-carriage and any surface where soil containing exotic seeds may exist. Arrangements shall be made for inspections of each piece of equipment before entering each Project site to ensure all equipment has been properly washed. Equipment found operating on the Project that has not been i.e., properly washed shall be shut down and may be subject to citation.</p> <ol style="list-style-type: none"> 1. Certified weed-free permanent and temporary erosion control measures shall be implemented to minimize erosion and sedimentation during and after construction. 2. The contractor shall conform to applicable federal, state, and local seed and noxious weed laws. 3. Nursery operations where plants are stored, propagated, or purchased must certify implementation of best management practices to reduce pest and pathogen contamination within their nursery. 4. Disturbed and decompacted areas outside the restoration area shall be revegetated with locally native vegetation. Revegetated areas shall be protected and tended, including watering when needed, until restoration criteria specified by regulatory agency-issued permits is complete. 5. All tree removal and pruning activities shall include measures to avoid the spread of the Sudden Oak Death (SOD) pathogen. Such measures may include, but are not limited to the following: <ol style="list-style-type: none"> i. As a precaution against spreading the pathogen, clean and disinfect pruning tools after use on confirmed or suspected infested trees or in known infested areas. Sanitize tools before pruning healthy trees or working in pathogen-free areas. Clean chippers and other vehicles of mud, dirt, leaves, organic material, and woody debris before leaving a site known to have SOD and before entering a site with susceptible hosts. ii. Inform crews about the arboricultural implications of SOD and sanitation practices when they are working in infested areas. iii. Provide crews with sanitation kits containing chlorine bleach, scrub brush, metal scraper, boot brush, and plastic gloves. iv. Sanitize shoes, pruning gear, and other equipment before working in an area with susceptible species. v. When possible, work on SOD-infected and susceptible species during the dry season (June-October). When working in wet conditions, keep equipment on paved, graveled, or dry surfaces and avoid mud. Work in disease-free areas before proceeding to infested areas. vi. If possible, do not collect soil or plant material (wood, brush, leaves, and litter) from host trees in the quarantine area. Within the quarantine area, host material (e.g., wood, bark, brush, chips, leaves, or firewood) from tree removals or pruning of symptomatic or non-symptomatic host plants should remain onsite to minimize pathogen spread. vii. Use all reasonable methods to sanitize personal gear and crew equipment before leaving a SOD infested site. Scrape, brush, and/or hose off accumulated soil and mud from clothing, gloves, boots, and shoes. Remove mud and plant debris by blowing out or power washing chipper trucks, chippers, bucket trucks, fertilization and soil aeration equipment, cranes, and other vehicles. Restrict the movement of soil and leaf litter under and around infected trees as spores may be found there. viii. Tools used in tree removal/pruning may become contaminated and should be disinfected with alcohol or chlorine bleach. 	<p>Contractor/ Flood Control District</p>	<p>During construction</p>		

TABLE A-1 (CONTINUED)
MITIGATION, MONITORING, AND REPORTING PROGRAM

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.5 Biological Resources (cont.)					
Impact 4.5-8: Project activities could adversely affect wetlands and other waters.	See Mitigation Measures 4.5-7a and 4.57b, above.	4.5-7a. Qualified Botanist; Contractor/Engineer 4.57b. Flood Control District (Habitat Restoration and Monitoring Plan); Contractor, Qualified Biologist (vegetation salvage)	4.5-7a. Prior to construction; during construction 4.57b. Prior to construction; after construction		
Impact 4.5-9: Project construction could adversely affect riparian wildlife movement corridors.	See Mitigation Measures 4.5-1a, 4.5-3b, 4.5-4, and 4.5-6, above.	4.5-1a. Flood Control District/Contractor 4.5-3b. Qualified biologist (site surveying); Contractor (trench covering, temporary fencing) 4.5-4. Flood Control District/ Contractor (scheduling tree removal); Qualified biologist (surveys, monitoring) 4.5-6. Qualified bat biologist	4.5-1a. During construction 4.5-3b. Prior to and during construction; During construction 4.5-4. Prior to construction; during construction 4.5-6. Prior to construction		
Impact 4.5-10: Project construction would require tree removal.	Mitigation Measure 4.5-10: Mitigation for Removal of Heritage or Protected Trees During construction, as much understory brush and as many native trees as possible shall be retained, to maintain shade-producing and bank-stabilizing vegetation for the creeks. All trees to remain during construction within the grading area shall be protected and trimmed if necessary to ensure their trunks and/or limbs are not disturbed during construction. To mitigate for tree removal: For each tree to be removed, the Flood Control District shall plant a replacement tree of the same species or a suitable native species substitute, at a rate of one planting per tree removed or such other mitigation ratio requirements included in the LSAA to be obtained from CDFW (for riparian trees) or any applicable County and/or town recommendations (for heritage trees), and ensure that replacement trees are planted within or in the vicinity of the Project sites to the maximum extent practicable, as follows: 1. Trees shall be replaced within the first year after the completion of construction or as soon as possible after construction is completed. 2. Selection of replacement sites and installation of replacement plantings shall be supervised by an arborist or biologist with experience in restoration. Irrigation of tree plantings during the initial establishment period shall be provided as deemed necessary by an arborist or biologist, consistent with the site Habitat Restoration and Monitoring Plan (Mitigation Measure 4.5-7b) .	Contractor/ Flood Control District	During construction; After construction		
4.8 Hazards and Hazardous Materials					
Impact 4.8-2: The Project could create a significant hazard to the public or the environment from the Project's location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	Mitigation Measure 4.8-2a: Check 700/750 Sir Francis Drake Boulevard Investigation Status Prior to beginning construction activities, the contractor shall check the status of the 700/750 Sir Francis Drake Boulevard investigation available at the SWRCB GeoTracker website at: http://geotracker.waterboards.ca.gov/ . Relevant information from the GeoTracker shall be used to inform the Health and Safety Plan and Soil Management Plan, described in subsequent mitigation measures.	Contractor	Prior to construction		
	Mitigation Measure 4.8-2b: Health and Safety Plan The construction contractor(s) shall prepare and implement a site-specific Health and Safety Plan in accordance with 29 CFR 1910.120 to protect construction workers and the public during all excavation and grading activities. The Health and Safety Plan shall include, but is not limited to, the following elements: 1. Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site health and safety plan; 2. A summary of all potential risks to construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals based on the most recent reporting of the investigation at 700/750 Sir Francis Drake Boulevard site overseen by the Regional Water Quality Control Board; 3. Specified personal protective equipment and decontamination procedures, if needed; 4. Emergency procedures, including route to the nearest hospital; and 5. Procedures to be followed in the event that evidence of potential soil or groundwater contamination (such as soil staining, noxious odors, debris or buried storage containers) is encountered.	Contractor	Prior to construction		

**TABLE A-1 (CONTINUED)
MITIGATION, MONITORING, AND REPORTING PROGRAM**

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.8 Hazards and Hazardous Materials (cont.)					
Impact 4.8-2 (cont.)	<p>These procedures shall be in accordance with hazardous waste operations regulations and specifically include, but are not limited to, the following: immediately stopping work in the vicinity of unknown discovered or suspected hazardous materials release and notifying the Marin County CUPA (415-473-7085).</p> <p>Mitigation Measure 4.8-2b applies to both the Nursery Basin and the Downtown San Anselmo sites.</p>				
	<p>Mitigation Measure 4.8-2c: Soil Management Plan</p> <p>For the Downtown San Anselmo site, the Flood Control District or its contractor shall develop and implement a Soil Management Plan that includes a materials disposal plan specifying how the construction contractor shall remove, handle, transport, and dispose of all excavated material in a safe, appropriate, and lawful manner. The plan shall identify protocols for training workers to recognize potential soil contamination (such as soil staining, noxious odors, debris or buried storage containers), soil testing and disposal by a qualified contractor in the event that contamination is identified, and identification of approved disposal sites (e.g., Redwood Landfill in Novato). Contract specifications shall mandate approval of the Soil Management Plan by the Flood Control District as well as full compliance with all applicable local, state, and federal regulations related to the identification, transportation, and disposal of hazardous materials.</p>	Flood Control District/ Contractor	Prior to construction; during construction		
4.9 Hydrology and Water Quality					
Impact 4.9-1: Project construction could violate water quality standards and/or waste discharge requirements, provide substantial additional sources of polluted runoff, or otherwise substantially degrade water quality.	<p>Mitigation Measure 4.9-1: Implement Dewatering BMPs for In-Water Work</p> <p>For in-water dewatering during sediment removal activities, the Flood Control District or its contractor(s) shall prepare a Dewatering Plan. The Dewatering Plan shall identify best management practices (BMPs) that ensure sediment removal activities meet water quality objectives. In-stream sediment removal shall follow approved and permitted dewatering practices for wet weather sediment removal during more infrequent flood events in Fairfax Creek. This work shall be timed to take place as flows are receding and only after instream measures to reduce downstream turbidity are in place. In addition, the Flood Control District shall implement the measures below, or whatever more stringent water quality protection measures are imposed by the RWQCB.</p> <ol style="list-style-type: none"> All work performed in-water shall be completed in a manner that meets the water quality objectives to ensure the protection of beneficial uses as specified in the Basin Plan All dewatering and diversion methods shall be installed such that natural flow is maintained upstream and downstream of the project area. Any temporary dams or diversion shall be installed such that the diversion does not cause sedimentation, siltation, or erosion upstream or downstream of the project area. Screened pumps shall be used in accordance with CDFW's fish screening criteria and in accordance with the NMFS Fish Screening Criteria for Anadromous Salmonids and the Addendum for Juvenile Fish Screen Criteria for Pump Intakes Cofferdams shall remain in place and functional throughout the in-stream construction or maintenance periods. Disturbance of protected riparian vegetation shall be limited or avoided entirely. 	Flood Control District/ Contractor	Prior to construction (Dewatering Plan); During construction (in-water work)		
Impact 4.9-3. The Project would alter existing drainage patterns, potentially causing new erosion or siltation.	<p>Mitigation Measure 4.9-3a. Prioritize Nursery Basin Reach for Stream Maintenance</p> <p>The Stream Maintenance Program waste discharge requirements impose limits on the total volume of material allowed to be removed from all of the streams covered by that permit. In order to retain the design capacity of the Nursery Basin and the associated storage within the Fairfax Creek channel behind the diversion structure, the Flood Control District shall prioritize sediment removal at this site over other sites covered by the Stream Maintenance Program and shall remove all deposited sediment up to the maximum volume allowed under the existing permit (2,100 cubic yards). If deposited sediment still remains after removing the maximum volume, then this site shall be prioritized in subsequent years to remove the remaining sediment and any newly accumulated material, again up to the maximum allowed.</p>	Flood Control District	After construction		
	<p>Mitigation Measure 4.9-3b. Scour Analysis and Protection Measures Upstream of the Downtown San Anselmo Site</p> <p>Due to the dependence of erosion and sedimentation patterns on the bed-scale morphology of the new structures, measures to counter scour and sedimentation issues must be based on more advanced project design. To reduce Project impacts on erosion and sedimentation, the Flood Control District shall conduct a scour analysis for the San Anselmo Creek channel upstream of the Downtown San Anselmo site and then develop and implement appropriate scour countermeasures from the analysis into project design and operations. The analysis shall be based on at least 30 percent design and must evaluate the potential for scour and channel bank erosion including specifying the expected depth and lateral extent both immediately upstream and downstream of the Project site from 634-636 San Anselmo Avenue to Bridge Avenue bridge. The analysis shall recommend foundation designs and scour protection measures that protect structures to depths below potential scour, estimated using standard engineering methods. The Flood Control District shall implement the foundation designs and scour protection measures in final project design. Foundation design and scour protection measures commonly used to protect existing in-channel structures and banks and that could be implemented in this Project include but are not limited to:</p> <ol style="list-style-type: none"> Adding new rock revetment or extending the depth of existing rock revetments Extending the foundations of vertical retaining walls using sheet pile or concrete 	Flood Control District	Prior to construction		

TABLE A-1 (CONTINUED)
MITIGATION, MONITORING, AND REPORTING PROGRAM

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.9 Hydrology and Water Quality (cont.)					
<p>Impact 4.9-4: The Project would substantially alter the existing drainage pattern of the watershed, altering patterns of flooding onsite and offsite.</p>	<p>Mitigation Measure 4.9-4: Provide Flood Protection to Substantially Affected Areas</p> <p>For areas upstream and downstream of the Winship Bridge (between Barber Avenue and the Sir Francis Drake Bridge): If the Winship Bridge Replacement Project is not completed prior to construction of the Project, the Flood Control District shall develop, fund, and implement flood barriers on properties where existing habitable structures would experience new inundation in a 25-year event. The flood barriers shall be designed based on hydraulic modeling demonstrating that the flood barriers would protect existing habitable structures on any properties upstream of the Sir Francis Drake Bridge from new inundation during the 25-year event, or to any higher degree of protection required for that particular type of measure by applicable building codes. Flood barriers include but are not limited to the following measures:</p> <ul style="list-style-type: none"> • <u>Elevation of structures above the 100-year flood elevations</u> • <u>Basement removal and construction of an addition to contain utilities removed from the basement</u> • <u>Wet flood proofing of structures, in which, with use of water resistant materials, floodwaters are allowed to enter a structure during a flood event</u> • <u>Dry flood proofing of structures</u> • <u>Berms or flood walls</u> <p>For areas immediately upstream of the Nursery Basin site: The Flood Control District shall develop, fund, and implement flood barriers on properties where existing habitable structures would experience new inundation in a 25-year event.</p> <p>For both of those locations: The flood barriers would ensure that existing habitable structures would not be inundated by the 25-year event. Upon confirmation of permission by the property owners, the Flood Control District shall implement this measure, including implementing any measures identified in permits required from the California Department of Fish and Wildlife, Regional Water Quality Control Board, or other regulatory agencies. However, the potentially adversely affected parcels are privately owned, and the Flood Control District cannot necessarily <u>is not proposing to require the installation or implementation of flood barriers because without the consent of the property owner(s), who may specifically request that such measures not be implemented.</u> In that case, this Mitigation Measure shall <u>would</u> not be implemented, and the affected parcels may experience an increased level of flood inundation in a 25-year event or larger.</p> <p><u>The degree of flood protection provided to an individual property will vary depending on the specifics of the flood barrier selected. For most of the flood barriers, the Flood Control District shall provide protection from the 25-year event. However, pursuant to Marin County building code and associated permitting requirements, any increase in structure elevation must be to an elevation sufficient to raise the finished first floor above the elevation of the 100-year flood event. Therefore, property owners who accept that form of flood barrier would receive assistance to implement 100-year protection.</u></p> <p>Funding and Implementation Responsibility (Both Locations): For flood walls or berms at the top-of-bank of San Anselmo Creek or Fairfax Creek on privately owned parcels and with the property owners' permission, the Flood Control District shall fund, design, build, and maintain all aspects of those measures, including their possible future removal if implementation of other flood risk reduction projects renders these flood walls or berms unnecessary as determined by the Flood Control District. For a flood barrier that involves improvements or modifications to privately owned habitable structures covered by Mitigation Measure 4.9-4 (structure elevation, wet proofing, dry proofing, basement removal and construction of an addition to house water heaters, furnaces, and similar home appliances, etc.), the Flood Control District shall fully fund the design and provide funding to the property owner for implementation –that is proportional to the increased flood depth with the project. The funding would be provided to the property owner to implement these modifications or improvements. The property owner would be responsible for construction, implementation, and future maintenance of the structure and any associated flood mitigation measures or improvements.</p>	Flood Control District	Prior to construction		
4.14 Parks and Recreation					
<p>Impact 4.14-2: Construction and operation of the Project could include public access and recreational facilities or could require the construction or expansion of recreational facilities which could have an adverse physical effect on the environment.</p>	<p>See Mitigation Measures 4.3-1 and 4.9-1, above.</p>	<p>4.3-1. Flood Control District/ Contractor 4.9-1. Flood Control District/ Contractor</p>	<p>4.3-1. During construction 4.9-1. Prior to construction (Dewatering Plan); During construction (in-water work)</p>		

TABLE A-1 (CONTINUED)
MITIGATION, MONITORING, AND REPORTING PROGRAM

Significant Environmental Impact	Mitigation Measure	Implemented By	When Implemented	Monitored By	Verified By (Date and Signature)
4.15 Transportation and Circulation					
<p>Impact 4.15-1: Construction activity associated with the Project would temporarily generate increased traffic volumes in relation to the existing traffic load and capacity of the road system (potentially resulting in a substantial increase in traffic congestion affecting vehicle or transit circulation), and could conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system.</p>	<p>Mitigation Measure 4.15-1: Traffic Management Plan</p> <p>Prior to initiation of construction, the Project contractor(s) shall use a qualified traffic engineer to prepare a TMP. The TMP shall be developed during the design phase on the basis of detailed design plans for the approved Project. The TMP shall be reviewed and approved by the Flood Control District and agencies with jurisdiction over roadways affected by Project construction activities, prior to construction. Once approved, the TMP shall be incorporated into the contract documents specifications. The TMP shall include, but not necessarily be limited to, the elements listed below:</p> <ol style="list-style-type: none"> 1. Develop truck access routes to minimize impacts on local street circulation. The route selection for movement of heavy equipment and truck traffic shall be coordinated with the Marin County Department of Public Works, Marin County Sheriff's Department, and Police Departments for applicable towns, cities, and unincorporated communities. Truck drivers shall be notified of, and required to use, the most direct route between the Project work sites and U.S. 101. 2. As needed to avoid unacceptably adverse impacts on traffic flow, schedule truck trips outside of peak morning and afternoon/evening traffic hours. 3. Control and monitor construction vehicle movements by enforcing standard construction specifications through periodic on-site inspections. 4. Install traffic control devices where traffic conditions warrant, as specified in the applicable jurisdiction's standards (e.g., the California Manual on Uniform Traffic Control Devices; Part 6: Temporary Traffic Control); flaggers would be used, when warranted, to control vehicle movements. 5. Implement a public information program to notify interested parties of the impending construction activities using means such as print media, radio, and/or web-based messages and information. 6. Comply with roadside safety protocols to reduce the risk of accidents. 7. Maintain access for emergency vehicles at all times. Provide advance notification to local police, fire, and emergency service providers of the timing, location, and duration of construction activities that could affect the movement of emergency vehicles on area roadways. 8. Store all equipment and materials in designated contractor staging areas on or adjacent to the worksite, in such a manner to minimize obstruction to traffic. 9. Identify locations for parking by construction workers (within the construction work site or at the designated construction staging areas, or, if needed, at a nearby location with transport provided between the parking location and the worksite). 10. Prior to Project construction, document road conditions for all routes that shall be used by Project-related vehicles. Roads damaged by construction shall be repaired to a structural condition equal to that which existed prior to construction activity. 11. Maintaining pedestrian and bicycle access and circulation during Project construction where safe to do so. If construction activities encroach on bicycle routes or multi-use paths, advance warning signs (e.g., "Bicyclists Allowed Use of Full Lane" and/or "Share the Road") shall be posted that indicate the presence of such users. <p>During construction, an environmental compliance manager shall monitor and complete a construction monitor environmental inspection report checklist to ensure that the contractor implements the TMP measures included in the contract documents. Any noncompliance shall be documented and reported to the Flood Control District to ensure corrective action. A final compliance report shall be prepared post-construction.</p>	<p>Qualified Traffic Engineer/ Contractor/ Flood Control District; Construction Monitor (environmental inspection)</p>	<p>Prior to construction (TMP); During and after construction (construction monitor environmental inspection)</p>		
<p>Impact 4.15-2: Implementation of the Project could impede access to local streets or adjacent uses, including access for emergency vehicles.</p>	<p>See Mitigation Measure 4.15-1, above.</p>	<p>Qualified Traffic Engineer/ Contractor/ Flood Control District; Environmental compliance manager (construction monitor environmental inspection)</p>	<p>Prior to construction (TMP); During and after construction (construction monitor environmental inspection)</p>		
<p>Impact 4.15-3: Implementation of the Project could have an adverse effect on pedestrian and bicycle accessibility and safety.</p>	<p>See Mitigation Measure 4.15-1, above.</p>	<p>Qualified Traffic Engineer/ Contractor/ Flood Control District; Environmental compliance manager (construction monitor environmental inspection)</p>	<p>Prior to construction (TMP); During and after construction (construction monitor environmental inspection)</p>		
<p>Impact 4.15-4: Construction activity associated with the Project could temporarily increase traffic safety hazards due to incompatible uses (e.g., heavy truck traffic, and roadway wear-and-tear).</p>	<p>See Mitigation Measure 4.15-1, above.</p>	<p>Qualified Traffic Engineer/ Contractor/ Flood Control District; Environmental compliance manager (construction monitor environmental inspection)</p>	<p>Prior to construction (TMP); During and after construction (construction monitor environmental inspection)</p>		

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