

# Marin County 2015 Climate Action Plan Update

## Addendum to the 2007 Marin Countywide Plan Final Environmental Impact Report

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# Acronyms and Abbreviations

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2015 CAP Update	Marin Climate Action Plan Update
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
C&D	construction and demolition
CAFE	California Fuel Efficiency
CEQA	California Environmental Quality Act
County	Marin County
CSE	Countywide Siting Element
CWP	Countywide Plan
CWP FEIR	Marin Countywide Plan Final EIR
EIR	Environmental Impact Report
GHG	greenhouse gas
LOS	level of service
LTS	less than significant
MCE	Marin Clean Energy
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PM	particulate matter
PV	photovoltaic
ROG	reactive organic gases
S	significant
SCA	standard condition of approval
SR	State Route
SU	significant and unavoidable
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TDM	transportation demand management
TOD	transit-oriented development
VMT	vehicle miles traveled

## I. Introduction

Marin County (County) proposes to adopt the Marin Climate Action Plan Update (2015 CAP Update) to implement Marin Countywide Plan (CWP) policies on greenhouse gas (GHG) emissions and climate change. The potential approval of the 2015 CAP Update is subsequent to the circulation of CWP's Draft Environmental Impact Report (EIR) and certification of the 2007 Final EIR. The environmental effects of the proposed 2015 CAP Update compared to the environmental effects of CWP policies on GHG emissions and climate change in the certified CWP EIR are examined in this addendum. In preparing the addendum, all of the potential impacts identified on the Marin County "Environmental Checklist for Supplemental Environmental Review," included in Section II, *Supplemental Environmental Review*, were considered.

Under the California Environmental Quality Act (CEQA), an addendum to an EIR is needed if minor technical changes or modifications to a proposed project occur (CEQA Guidelines Section 15164). An addendum is appropriate only if these minor technical changes or modifications do not result in any new significant impacts or a substantial increase in the severity of previously identified significant impacts. The addendum does not need to be circulated for public review (CEQA Guidelines Section 15164(c)); however, an addendum is to be considered along with the Final EIR by the decision-making body prior to making a decision on a project (CEQA Guidelines Section 15164(d)).

This addendum to the 2007 Marin Countywide Plan Final EIR (CWP FEIR) (State Clearinghouse No. 2004022176) has been prepared in accordance with CEQA Guidelines Section 15164.

## II. Project Background and Supplemental Environmental Review

The CWP, adopted in November 2007, includes policies and programs in the areas of biological resources, water resources, open space, community development, community design, energy and green building, housing, transportation, public facilities and services, including policies aimed to reduce GHG emissions throughout the County. Specifically, Program AIR-4.f of the CWP requires the County to establish a climate change planning process. To meet this requirement, the County prepared the 2015 CAP Update. The 2015 CAP Update represents the implementation of policies and programs contained in the CWP that focused on mitigating and adapting to climate change. Thus, the measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP.

The main purpose of the 2015 CAP Update is to reduce and avoid GHG emissions associated with both community and municipal activities, which include everyday activities of local residents and businesses within the unincorporated county along with municipal County government operations. The 2015 CAP Update includes the following specific GHG-reduction goals:

1. Reduce community GHG emission to 30 percent below 1990 levels by 2020.
2. Reduce municipal GHG emissions to 15 percent below 1990 levels by 2020.

To achieve these GHG reduction goals, the 2015 CAP Update includes municipal and community measures and actions in the areas of energy efficiency and renewable energy; land use, transportation, and off-road equipment; waste reduction, reuse, and recycling; water conservation and wastewater treatment; and agriculture. Table 1 lists the 2015 CAP Update measures by strategy

area, provides a description of the activities supported by each measure, and identifies the goals, policies, and programs provided in the CWP that correspond to each 2015 CAP Update measure.

**Table 1. 2015 CAP Update Measures Cross-Referenced to CWP Policies and Programs**

2015 CAP Update Measure and Description	Implementation of CWP Policy/Program
<b>Community Measures</b>	
<i>Energy Efficiency and Renewable Energy</i>	
Energy-1: Community Choice Aggregation Support MCE expansion	AIR-4.1: Reduce Greenhouse Gas Emissions AIR-4.a: Reduce Greenhouse Gas Emissions Resulting from Energy Use in Buildings
Energy-2: Energy Efficiency Ongoing and expanded energy efficient retrofits, tree planting	EN-1.d: Explore energy efficiency standards for existing buildings EN-1.h: Support low income weatherization EN-1.i: Reduce energy use in processing operations AIR-4.a: Reduce Greenhouse Gas Emissions Resulting from Energy Use in Buildings AIR-4.j: Acquire and restore natural resource systems AIR-4.k: Encourage the Planting of Trees BIO-4.I: Preserve Agricultural Lands DES-3.e: Encourage Small-Scale Green Spaces
Energy-3: Solar Energy Solar installation for existing and new development	AIR-4.1: Reduce Greenhouse Gas Emissions AIR-4.a: Reduce Greenhouse Gas Emissions Resulting from Energy Use in Buildings
SP Energy 1: Supporting Energy Measure District financing program	AIR-4.1: Reduce Greenhouse Gas Emissions AIR-4.a: Reduce Greenhouse Gas Emissions Resulting from Energy Use in Buildings
SP Energy 2: Supporting Energy Measure Upgrading code for solar	AIR-4.1: Reduce Greenhouse Gas Emissions AIR-4.a: Reduce Greenhouse Gas Emissions Resulting from Energy Use in Buildings
SP Energy 3: Supporting Energy Measure Promote MCE Deep Green	AIR-4.1: Reduce Greenhouse Gas Emissions AIR-4.a: Reduce Greenhouse Gas Emissions Resulting from Energy Use in Buildings

2015 CAP Update Measure and Description	Implementation of CWP Policy/Program
<i>Land Use, Transportation, and Off-road Equipment</i>	
<p>Trans-1: Land Use Design and VMT Reduction                      Promote mixed use, infill and TOD per MCP, carpools/vanpools, TDM, alternate work schedules, telecommuting, transportation marketing</p>	<p>HS-3.o: Conduct a Survey of Potential Mixed-Use Sites                      HS-3.q: Establish Mixed-Use Development Standards and Incentives                      CD-2.c: Enact Zoning Changes                      CD-2.g: Identify and Plan Mixed-Use Sites                      CD-5.b: Develop Highway 101 Corridor-Specific Plans                      DES-2.a: Designate Target Nodes                      DES-2.b: Encourage Flexible-Use Building Types                      DES-2.c: Allow Mixed Use in Commercial Districts                      DES-3.a: Encourage Mixed-Use Projects                      HS-3.o: Conduct a Survey of Potential Mixed-Use Sites                      HS-3.p: Prepare a White Paper on Mixed-Use Housing Development Feasibility                      TR-3.f: Promote Transit-Oriented Development                      DES-2.a: Designate Target Nodes                      CD-5.b: Develop Highway 101 Corridor-Specific Plans                      HS-3m: Establish Transit-Oriented Development (TOD) Zoning Standards                      EC-1.h: Encourage Transit-Oriented Development                      TR-1.a: Support Alternate Work Schedules</p>
<p>Trans-2: Public Transportation                      Expand transit service</p>	<p>TR-3.a: Increase Bus and Ferry Services                      AIR-4.b: Reduce Greenhouse Gas Emissions Resulting from Transportation</p>
<p>Trans-3: Off-Road Equipment                      Electric landscaping equipment</p>	<p>AIR-4.b: Reduce Greenhouse Gas Emissions Resulting from Transportation</p>
<p>SP Trans 1: Supporting Transportation Measure                      Improve job-housing balance</p>	<p>CD-5.f: Redefine Countywide Planning Functions                      HS-3.a: Complete a Nonresidential Job/Housing Linkage Study                      HS-3.b: Adopt a Job/Housing Linkage Ordinance</p>
<p>SP Trans 2: Supporting Transportation Measure                      Institute growth boundaries, ordinances or programs to limit suburban sprawl</p>	<p>AIR-4.l: Preserve Agricultural Lands                      AIR-4.m: Focus Development in Urban Corridors                      OS-2.b: Coordinate Open Space Planning                      OS-2.c: Acquire and Protect Lands Pursuant to the Open Space District's Mission Statement                      OS-2.g: Apply County Zoning                      OS-2.h: Require Clustered Development                      CD-1.a: Keep Urban Uses in the City-Centered Corridor                      CD-1.b: Preserve Resources in the Baylands Corridor                      CD-1.c: Reduce Potential Impacts</p>
<p>SP Trans 3: Supporting Transportation Measure                      Implement Housing Overlay Zone focused on city centered corridor</p>	<p>CD-2.d: Implement the Housing Overlay Designation Program                      HS-3.v: Evaluate the Feasibility of an "Affordable Housing Overlay Designation" Zoning Designation                      CD-1.a: Keep Urban Uses in the City-Centered Corridor</p>
<p>SP Trans 4: Supporting Transportation Measure                      Senior Mobility Action Plan</p>	<p>AIR-4.b: Reduce Greenhouse Gas Emissions Resulting from Transportation</p>

2015 CAP Update Measure and Description	Implementation of CWP Policy/Program
SP Trans 5: Supporting Transportation Measure Implement Marin County Unincorporated Area Bicycle and Pedestrian Master Plan	TR-2.a: Encourage bicycling and walking TR-2.b: Adopt Standards for Pedestrian and Bicycle Access TR-2c: Support Bicycle Stations and Consider Attended Parking TR-2d: Fund Projects (Marin County Unincorporated Area Bicycle and Pedestrian Master Plan) TR-2e: Prioritize Completion of the North-South and East-West Bikeways TR-2g: Add Bicycle Lanes TR-2h: Encourage Innovative Bicycle Lane Design TR-2i: Renovate Tunnels Along the Planned North-South Bikeway into Multi-Use Pathways TR-2l: Complete Streets
SP Trans 6: Supporting Transportation Measure Expand the “safe routes to school” program	TR-2.b: Adopt Standards for Pedestrian and Bicycle Access TR-2.j: Ensure Safe Routes to Schools TR-2.k: Consider Pedestrian Needs
SP Trans 7: Supporting Transportation Measure Employer-based trip reduction	AIR-3.a: Support Voluntary Employer-Based Trip Reduction
SP Trans 8: Supporting Transportation Measure Traffic signal synchronization	AIR-3.e Improve Arterial Traffic Management
SP Trans 9: Supporting Transportation Measure Support alternative fuels vehicles	TR-4.e. Support Alternative Fuels Vehicles
SP Trans 10: Supporting Transportation Measure Support alternate work schedules and telecommute programs	TR-1.a. Support Alternate Work Schedules
SP Trans 11: Supporting Transportation Measure Transit agency coordination	AIR-4.b: Reduce Greenhouse Gas Emissions Resulting from Transportation.
SP Trans 12: Supporting Transportation Measure Parking requirements	DES-1.a: Add Design Components to Community Plans DES-2.a: Designate Target Nodes HS-3.q: Establish Mixed-Use Development Standards and Incentives TR-1.q: Review Parking Requirements
SP Trans 13: Supporting Transportation Measure Adopt flexible parking standards	TR-1.i: Adopt Flexible Parking Standards
SP Trans 14: Supporting Transportation Measure Promote transportation choices	TR-1.c: Promote Transportation Alternatives
SP Trans 15: Supporting Transportation Measure Coordinate with local agencies	TR-1.d: Coordinate with Local Agencies
SP Trans 16: Supporting Transportation Measure West Marin traffic reduction program	TR-3.h: Implement a Traffic Reduction Program for Recreational Traffic to West Marin
<i>Waste Reduction, Reuse, and Recycling</i>	
Waste-1: Zero Waste by 2025 Reduce, reuse, recycle	AIR-4.c: Reduce Methane Emissions Released from Waste Disposal
SP Waste-1: Supporting Waste Measure Landfill gas to energy projects	AIR-4.c: Reduce Methane Emissions Released from Waste Disposal
SP Waste-2: Supporting Waste Measure Construction and demolition reuse/recycling ordinance	Existing C&D Waste Recovery Ordinance EN-3.c: Divert Construction Waste
SP Waste-3: Supporting Waste Measure Waste education program	AIR-4.c: Reduce Methane Emissions Released from Waste Disposal

2015 CAP Update Measure and Description	Implementation of CWP Policy/Program
<i>Water Conservation and Wastewater Treatment</i>	
Water/Wastewater-1: Water Conservation	PFS-2.a: Support and Integrate Water Conservation Efforts PFS-2.b: Minimize the Demand for Water in New Development
Water/Wastewater-2: Increase Pump Efficiency	PFS-2.a: Support and Integrate Water Conservation Efforts PFS-2.b: Minimize the Demand for Water in New Development PFS-2.l: Reduce Energy Use from Water Facilities
Water/Wastewater-3: Reduce Wastewater Generation	PFS-3.a: Reduce wastewater volume PFS-3.e: Explore wastewater disposal alternatives PFS-3.f Develop appropriate wastewater treatment technologies
SP Water/Wastewater 1: Supporting Water/Wastewater Measure Encourage water conservation	PFS-2.b: Minimize the demand for water in new development PFS-2.i: Promote water saving irrigation PFS-2.l: Reduce energy use from water facilities WR-3.a: Support Water Conservation Efforts WR-3.b: Support and Integrate Water District Conservation Efforts AG-1.p: Evaluate Small-Scale Water Development AG-1.q: Support Irrigation Alternatives
SP Water/Wastewater 2: Supporting Water/Wastewater Measure Equipment updates	AIR-4.1: Reduce Greenhouse Gas Emissions AIR-4.a: Reduce Greenhouse Gas Emissions Resulting from Energy Use in Buildings
SP Water/Wastewater 3: Supporting Water/Wastewater Measure Offer low interest loan program	PFS-3.b: Promote Water Conservation
<i>Agriculture</i>	
Agriculture-1: Methane Capture and Combustion Methane gas digestion for energy at dairies and livestock facilities	AIR-4.c: Reduce Methane Emissions Released from Waste Disposal AIR-4.d: Reduce Greenhouse Gas Emissions from Agriculture
SP Agriculture 1: Supporting Agricultural Measure Marin Carbon Project	AIR-4.2: Foster the Absorption of Greenhouse Gases AIR-4.d: Reduce Greenhouse Gas Emissions from Agriculture
SP Agriculture 2: Supporting Agricultural Measure Best management practices for agriculture	AIR-1.g: Require control measures for construction and agricultural activity AIR-4.d: Reduce greenhouse gas emissions from agriculture AIR-4.l: Preserve agricultural lands AIR-4.2: Foster the Absorption of Greenhouse Gases
SP Agriculture 3: Supporting Agricultural Measure Locally grown food/products	AG-2.6: Promote Small-Scale Crop Production AG-2.10: Increase Knowledge of Agriculture AG-2j: Promote local foods
SP Land Conservation 1: Supporting Land Conservation Measure Protect conservation areas	BIO-1: Enhanced Native Habitat and Biodiversity BIO-1.1: Protect Wetlands, Habitat for Special-Status Species, Sensitive Natural Communities, and Important Wildlife Nursery Areas and Movement Corridors BIO-1.2: Acquire Habitat BIO-1.3: Protect Woodlands, Forests, and Tree Resources
SP Land Conservation 2: Supporting Land Conservation Measure Create new vegetated open spaces	AIR-4.2: Foster the Absorption of Greenhouse Gases

2015 CAP Update Measure and Description	Implementation of CWP Policy/Program
<b>Municipal Measures</b>	
<i>Energy Efficiency and Renewable Energy</i>	
Energy-1: Energy Efficiency Improvements at the EOF, building retrofits, computers/printers, computer energy management, shade tree planting, efficient street lights	AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions.
Energy-2: Solar Power Solar panels on municipal facilities, carports and parking areas	AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions.
SP Energy 1-3: Supporting Energy Measures Outreach and education, paperless billing, data center virtualization, aeration blowers at CMSA, Food waste to energy at CMSA	AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions.
<i>Land Use, Transportation, and Off-road Equipment</i>	
Trans-1: New Vehicles Fuel efficient and/or smaller fleet vehicles, electrical vehicles, electric landscaping equipment	AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions.
Trans-2: Alternative Transportation Guaranteed ride home, green commute program	TR-1.c: Promote Transportation Alternatives AIR-4.b: Reduce Greenhouse Gas Emissions Resulting from Transportation AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions
Trans-3: Trip Reduction Telecommuting, parking management	AIR-4.b: Reduce Greenhouse Gas Emissions Resulting from Transportation AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions TR-1.a: Support Alternate Work Schedules
SP Trans 1-6: Supporting Trans Measures Vehicle idling, clean energy fuels program infrastructure, Smart GPS, fuel tracking system, vehicle maintenance program, bicycle safety program	AIR-4.b: Reduce Greenhouse Gas Emissions Resulting from Transportation AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions
<i>Waste Reduction, Reuse, and Recycling</i>	
Waste-1: Increase Recycling at County Facilities Recycling	AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions
SP Waste 1-5: Supporting Waste Measures Electronic and universal waste recycling, recycled paper purchasing, refrigerant BMPs, vending machine replacements, purchasing requirements	AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions
<i>Water Conservation and Wastewater Treatment</i>	
Water-1: Water Conservation Water conservation, irrigation monitoring and management	AIR-4.e: Reduce County Government Contributions to Greenhouse Gas Emissions

BMPs = best management practices

C&D = construction and demolition

MCE = Marin Clean Energy

TDM = transportation demand management

TOD = transit-oriented development

VMT = vehicle miles traveled

Although the 2015 CAP Update would result in lowered GHG emissions and lower criteria pollutant emissions, the actions required to implement the measures listed in Table 1 could result in secondary environmental effects. The measures and related actions can be grouped in the following categories:

- Energy Efficiency and Renewable Energy Measures
  - Installation of energy efficiency retrofits at existing facilities.
  - Installation of new solar facilities (i.e., solar rooftops) at existing and new facilities.
  - Installation of solar panels over carports and parking areas.
  - Planting of shade trees around County facilities.
- Land Use, Transportation, and Off-Road Equipment Measures
  - Construction of additional transit, bicycle, or pedestrian facilities.
  - Promotion of mixed-use, infill, and transit-oriented development.
  - Expansion of transit service.
- Waste Reduction, Reuse, and Recycling Measures
  - New construction or expansion of waste recycling or reuse collection or management facilities.
  - Installation of methane capture technology and monitoring systems at existing landfills.
- Water Conservation and Wastewater Treatment Measures
  - Implementation of water conservation and wastewater retrofits at existing facilities.
- Agriculture Measures
  - Installation of methane gas digesters at existing dairy and livestock facilities.
  - Implementation of carbon sequestration best management practices.

## Findings of the CWP FEIR

The 2015 CAP Update provides additional technical detail and clarity to the broad CWP goals, policies, and implementing programs. Broad environmental impacts associated with the implementation of the CWP have been analyzed at a programmatic level in the CWP FEIR. Because the 2015 CAP Update is part of the implementation of the CWP, the impacts of the 2015 CAP Update have also been disclosed at a programmatic level in the CWP FEIR. This addendum analyzes whether the 2015 CAP Update would result in new significant impacts or substantially more severe impacts than those disclosed in the CWP FEIR.

Table 2 summarizes the environmental impacts identified in the CWP FEIR. Significant and unavoidable adverse impacts were identified for land use, population, and housing; transportation; noise; biological resources; agriculture; water supply and demand; public services; and visual resources.

**Table 2. CWP FEIR Summary of Environmental Impacts and Mitigation Measures**

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<b>Land Use, Population, and Housing</b>			
Impact 4.1-1: Conflict with Applicable Land Use or Other Plans	LTS	None required	--
Impact 4.1-2: Growth and Concentration of Population	S	Mitigation Measure 4.1-2	SU
Impact 4.1-3: Land Use Conflict between Agricultural and Urban Uses	LTS	None required	--
Impact 4.1-4: Agricultural Processing, Retail Sales, and Visitor-Serving Uses	S	Mitigation Measure 4.1-4(a & b)	LTS
Impact 4.1-5: Development of Residential Land Uses Incompatible with Established Land Uses	S	Mitigation Measure 4.1-5	LTS
Impact 4.1-6: Jobs-to-Housing Ratio	LTS	None required	--
<b>Transportation</b>			
Impact 4.2-1: Increase in Vehicle Miles Travelled	S	Mitigation Measure 4.2-1	SU
Impact 4.2-2: Unacceptable LOS on U.S. 101 at Golden Gate Bridge	S	Mitigation Measure 4.2-2	SU
Impact 4.2-3: Unacceptable LOS on State Route 1 from U.S. 101 to Almonte Boulevard	S	Mitigation Measure 4.2-3	SU
Impact 4.2-4: Unacceptable LOS on State Route 131 from U.S. 101 to Strawberry Drive	S	Mitigation Measure 4.2-4	SU
Impact 4.2-5: Unacceptable LOS on Sir Francis Drake Boulevard from Bon Air Road to Wolfe Grade	S	Mitigation Measure 4.2-5	SU
Impact 4.2-6: Unacceptable LOS on Sir Francis Drake Boulevard from U.S. 101 to Eliseo Drive	S	Mitigation Measure 4.2-6	SU
Impact 4.2-7: Unacceptable LOS on East Sir Francis Drake Boulevard from Larkspur Ferry to San Quentin	S	Mitigation Measure 4.2-7	SU
Impact 4.2-8: Unacceptable LOS on I-580 at the Richmond Bridge	S	Mitigation Measure 4.2-8	SU
Impact 4.2-9: Unacceptable LOS on U.S. 101 from I-580 to Sir Francis Drake Boulevard	S	Mitigation Measure 4.2-9	SU
Impact 4.2-10: Unacceptable LOS on U.S. 101 from Second Street to I-580	S	Mitigation Measure 4.2-10	SU
Impact 4.2-11: Unacceptable LOS on South Novato Boulevard from U.S. 101 to Sunset Parkway	S	Mitigation Measure 4.2-11	SU
Impact 4.2-12: Unacceptable LOS on Lucas Valley Road from Las Gallinas Avenue to Los Gamos	S	Mitigation Measure 4.2-12	SU
Impact 4.2-13: Unacceptable LOS on U.S. 101 at the Sonoma / Marin County Line	S	Mitigation Measure 4.2-13	SU
Impact 4.2-14: Unacceptable LOS at Intersection of State Route 131 (Tiburon Boulevard) and Redwood Highway Frontage Road	S	Mitigation Measure 4.2-14	SU
Impact 4.2-15: Unacceptable LOS at Intersection of Second Street and Grand Avenue	S	Mitigation Measure 4.2-15	SU

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Impact 4.2-16: Unacceptable LOS at Intersection of Third Street and Grand Avenue	S	Mitigation Measure 4.2-16	SU
Impact 4.2-17: Unacceptable LOS at Intersection of Miller Creek Road and Las Gallinas Avenue	S	Mitigation Measure 4.2-17	SU
Impact 4.2-18 Unacceptable LOS at Intersection of Miller Creek Road and U.S. 101 Southbound Off-Ramp	S	Mitigation Measure 4.2-18	SU
Impact 4.2-19 Unacceptable LOS at Intersection of Miller Creek Road and U.S. 101 Northbound Off-Ramp	S	Mitigation Measure 4.2-19	SU
Impact 4.2-20 St. Vincent's / Silveira / Marinwood	S	Mitigation Measure 4.2-20 (a - d)	SU
Impact 4.2-21: San Rafael Rock Quarry	S	Mitigation Measure 4.2-21 (a & b)	SU
Impact 4.2-22: Kentfield	S	Mitigation Measure 4.2-22 (a & b)	SU
Impact 4.2-23: Strawberry	S	Mitigation Measure 4.2-23 (a & b)	SU
Impact 4.2-24: Tam Valley/Almonte	S	Mitigation Measure 4.2-24	SU
Impact 4.2-25: Marin City	LTS	None required	--
Impact 4.2-26: Increased Demand for Bicycle and Pedestrian Facilities and Impacts on Safety and Access	LTS	None required	--
Impact 4.2-27: Increased Demand for Public Transit Services	LTS	None required	--
<b>Air Quality</b>			
Impact 4.3-1: Inconsistency with Clean Air Plan	S	Mitigation Measure 4.3-1	SU
Impact 4.3-2: Inconsistency with Clean Air Plan Transportation Control Measures	S	Mitigation Measure 4.3-2 (a & b)	LTS
Impact 4.3-3: Buffer Zones for Potential Sources of Odor/Toxics	S	Mitigation Measure 4.3-3 (a - c)	LTS
Impact 4.3-4: Carbon Monoxide Concentrations Along Roadways	LTS	None required	--
Impact 4.3-5: Fugitive Dust Associated with Construction Projects	LTS	None required	--
Impact 4.3-6: Increase in Greenhouse Gas Emissions	S	Mitigation Measure 4.3-6 (a & b)	SU
<b>Noise</b>			
Impact 4.4-1: Increased Traffic Noise	LTS	None required	--
Impact 4.4-2: Increased Noise from Airports and Heliports	LTS	None required	--
Impact 4.4-3: Stationary Noise Sources	LTS	None required	--
Impact 4.4-4: Future Noise Sensitive Development	LTS	None required	--
Impact 4.4-5: Construction Noise	S	Mitigation Measure 4.5	SU
<b>Hydrology, Water Quality, and Flood Hazards</b>			
Impact 4.5-1: Water Quality Standards	S	Mitigation Measure 4.5-1 (a & b)	LTS
Impact 4.5-2: Water Quality – Soil Erosion and Downstream Sedimentation Related to Construction	LTS	None required	--
Impact 4.5-3: Groundwater Recharge	S	Mitigation Measure 4.5-3 (a & b)	LTS

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Impact 4.5-4: Drainage – On-site and Downstream Erosion Sedimentation	S	Mitigation Measure 4.5-4 (a – c)	LTS
Impact 4.5-5: Stormwater Drainage System Capacities	S	Mitigation Measure 4.5-5	LTS
Impact 4.5-6: Stormwater Drainage System Expansions	S	Mitigation Measure 4.5-6	LTS
Impact 4.5-7: Exposure of People or Structures to Flood Hazards	S	Mitigation Measure 4.5-4 (a) Mitigation Measure 4.5-7 (a – c)	LTS
<b>Biological Resources</b>			
Impact 4.6-1: Special-Status Species	S	Mitigation Measure 4.6-1	LTS
Impact 4.6-2: Sensitive Natural Communities	S	Mitigation Measure 4.6-2	LTS
Impact 4.6-3: Wetlands and Other Waters	LTS	None required	--
Impact 4.6-4: Wildlife Habitat and Movement Opportunities	S	Mitigation Measure 4.6-4 (a & b)	SU
Impact 4.6-5: Conflict with Local Policies or Ordinances	LTS	None required	--
Impact 4.6-6: Conflict with Adopted Habitat or Natural Community Conservation Plans	LTS	None required	--
<b>Geology</b>			
Impact 4.7-1: Surface Fault Rupture	S	Mitigation Measure 4.7-1 (a – c)	SU
Impact 4.7-2: Seismic Ground Shaking	S	Mitigation Measure 4.7-2 (a – d)	SU
Impact 4.7-3: Seismic-Related Ground Failure	S	Mitigation Measure 4.7-3 (a – c)	SU
Impact 4.7-4: Landsliding	S	Mitigation Measure 4.7-4 (a & b)	SU
Impact 4.7-5: Subsidence and Settlement	S	Mitigation Measure 4.7-3 (a – c) Mitigation Measure 4.7-5 (a – c)	LTS
Impact 4.7-6: Expansive Soils	S	Mitigation Measure 4.7-3 (a – c) Mitigation Measure 4.7-6 (a & b)	LTS
Impact 4.7-7: Septic Tank Suitability of Soils	S	Mitigation Measure 4.7-7	LTS
Impact 4.7-8: Tsunamis and Seiches	S	Mitigation Measure 4.7-8 (a & b)	SU
<b>Agriculture</b>			
Impact 4.8-1: Conversion of Agricultural Lands to Non-Agricultural Uses	S	Mitigation Measure 4.8-1	SU
Impact 4.8-2: Conflicts with Williamson Act Contracts	LTS	None required	--
<b>Water Supply and Demand</b>			
Impact 4.9-1: Adequacy of Water Supply During a Normal Year	S	Mitigation Measure 4.9-1 (a – c)	SU
Impact 4.9-2: Adequacy of Water Supply During a Drought and Multi-Drought Years	S	Mitigation Measure 4.9-2	SU
<b>Public Services</b>			
Impact 4.10-1: Release of Hazardous Materials	S	Mitigation Measure 4.10-1 (a & b)	LTS
Impact 4.10-2: Hazardous Emissions, Materials, or Waste near School Sites	S	Mitigation Measure 4.10-2 (a & b)	LTS
Impact 4.10-3: Development on a Hazardous Waste Site	S	Mitigation Measure 4.10-3	LTS
Impact 4.10-4: Increased Wastewater Treatment Demand	S	Mitigation Measure 4.10-4	LTS

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Impact 4.10-5: New or Expanded Wastewater Facilities	LTS	None required	--
Impact 4.10-6: Increased Solid Waste Disposal Demand	LTS	None required	--
Impact 4.10-7: Energy Consumption and Land Use Patterns	LTS	None required	--
Impact 4.10-8: Energy Consumption from Building Construction and Retrofit	S	Mitigation Measure 4.10-8	SU
Impact 4.10-9: Increased Demand for Fire Protection and Emergency Services Facilities	LTS	None required	--
Impact 4.10-10: Wildlife Hazards	LTS	None required	--
Impact 4.10-11: Demand for Additional Criminal Justice Facilities	LTS	None required	--
Impact 4.10-12: Demand for Public Education Services	LTS	None required	--
Impact 4.10-13: Increased Demand for Park and Recreation Services and Facilities	LTS	None required	--
<b>Cultural Resources</b>			
Impact 4.11-1: Historic Resources	S	Mitigation Measure 4.11-1	LTS
Impact 4.11-2: Archeological and Paleontological Resources and Human Remains	LTS	None required	--
<b>Visual Resources</b>			
Impact 4.12-1: Scenic Resources	LTS	None required	--
Impact 4.12-2: Community Character	S	Mitigation Measure 4.12-2	LTS
Impact 4.12-3: Views from Highways	LTS	None required	--
Impact 4.12-4: Light Pollution and Nighttime Sky	S	Mitigation Measure 4.12-4	SU

LOS = level of service

LTS = less than significant

S = significant

SU = significant and unavoidable

## Checklist for Supplemental Environmental Review

### 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?
<b>Would the Project:</b> a. Have a substantial adverse effect on a scenic vista?	Impact 4.12-1, page 4.12-12	No	No	No	N/A
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?	Impacts 4.12-1, page 4.12-12, and 4.12-3, page 4.12-18	No	No	No	N/A
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	Impact 4.12-2, page 4.12-15	No	No	No	Yes, Mitigation Measure 4.12-2
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Impact 4.12-4, page 4.12-20	No	No	No	Yes, Mitigation Measure 4.12-4

### Discussion

**a. Have a substantial adverse effect on a scenic vista?**

and

**c. Substantially degrade the existing visual character or quality of the site and its surroundings?**

As described in the CWP FEIR under Impacts 4.12-1 and 4.12-2, land use and development consistent with the CWP could introduce additional urban uses (e.g., residential, commercial, or industrial) to rural areas. This land use and development could degrade the visual quality of the County’s scenic resources and character of the County’s rural areas.

Implementation of several of the 2015 CAP Update measures would similarly result in physical changes to the existing visual environment through the construction of new structures or modifications to existing facilities. For example, renewable energy measures encourage retrofits or renewable energy additions to existing structures and the planting of shade trees. Transportation measures promote additional transit, bicycle, or pedestrian facilities that could result in minor changes to existing streetscapes. Land use measures could promote infill and transit-oriented

development within the city centers. Waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities and the installation of methane capture technology at existing landfills. Water conservation and wastewater treatment measures encourage retrofits at existing facilities for efficiency. Finally, agricultural measures encourage the installation of methane gas digesters at existing dairy and livestock facilities.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to alter or obstruct views of scenic vistas or degrade the existing visual character of the area would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs contained in the CWP (Policies DES-4.1, OS-2.2 through OS-2.6, and CD-1.1; Programs DES-4.a through DES-4.e, OS-2.a, OS-2.h, and CD-1.a through CD-1.e) would minimize impacts from the 2015 CAP Update measures related to changes to scenic vistas. Additionally, adherence to existing policies and programs contained in the CWP (Goals AG-1, DES-1, Policies AG-1.1 through AG-1.5, CD-1.3, DES 1.1, DES 4.1, DES-5.1, Programs AG-1.a, DES-1.a through DES-1.f, DES-3.b, and DES-4.c) and implementation of CWP FEIR Mitigation Measure 4.12-2 would minimize impacts from the 2015 CAP Update measures related to changes to existing visual character of the community.

With the actions in the 2015 CAP Update, the impact of implementation of the CWP on scenic vistas would remain less than significant and impacts on existing visual character would remain less than significant with mitigation.

**b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?**

As described in the CWP FEIR under Impact 4.12-1, land use and development consistent with the CWP could introduce additional urban uses (e.g., residential, commercial, or industrial) to rural areas. This land use and development could degrade the visual quality of the County's scenic resources, including scenic highways. There are currently no designated State scenic highways within Marin County, although the entire stretch of State Route (SR) 1, sections of U.S. Highway 101, and SR 37 are eligible for inclusion. As described in the CWP FEIR under Impact 4.12-3, views from these highways could be adversely affected by development of public facilities or other infrastructure projects along the highways or by uses and development that would be sited near the roadway.

Several 2015 CAP Update measures would similarly result in physical changes to the existing visual environment and adversely affect views from eligible highways through the development or modification of public facilities or other infrastructure projects. Renewable energy measures promoting retrofits or renewable energy additions to existing structures could result in adverse changes to existing visual resources. Retrofits and additions to structures along the highways would also adversely affect views from eligible highways. Transportation measures that could result in minor changes to existing streetscapes for additional transit, bicycle, or pedestrian facilities could adversely affect the County's scenic resources, including views from eligible highways. Likewise, waste reduction, reuse, and recycling measures would promote the construction of new waste recycling or reuse collection or management facilities that could negatively impact scenic resources, potentially including views from eligible highways.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to adversely affect scenic resources, including views from these highways, would have the same effect as described in

the CWP FEIR. Adherence to the existing policies and programs (Goal DES-4, Policies CD-1.1, CD-1.3, DES-4.1, OS-2.2 through OS-2.6, SV-2.4, and TR-1.6, Programs CD-1.a, CD-1.c through CD-1.e, DES-4.a through DES-4.f, OS-2.a, OS-2.h, and TR-1.o) contained in the CWP would minimize impacts from the 2015 CAP Update related to scenic resources, including those along scenic highways.

Thus, with the 2015 CAP Update, the CWP's impact on scenic resources, including scenic highways, would remain less than significant.

**d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?**

As described in the CWP FEIR under Impact 4.12-4, land uses and development consistent with the CWP would create additional sources of lighting resulting in sky glow, light trespass, and glare. This would be a significant and unavoidable impact, even with the existing provisions in the Marin County Development Code, incorporation of Mitigation Measure 4.12-4, and policies and programs contained in the CWP (Policy DES-1.c and Program DES-1.c) because some of the additional sources of lighting would be beyond the control of the County and it may not be reasonable to assume this visual impact could be reduced to a less-than-significant level.

Measures in the 2015 CAP Update could promote the construction of structures that could create new sources of substantial light and glare. For example, renewable energy measures promote the use of solar installations on existing and new development that could result in a new source of glare. Solar panels, in general, are angled to the sun which reduces their glare generation potential from street level perspectives. Photovoltaic (PV) panels use silicon to convert sunlight to electricity. Because silicon is naturally reflective, PV panels are coated with anti-reflective materials that allow light to pass through the silicon and minimize reflection. The dark appearance of PV panels (e.g., dark blue, black) is due to the fact that monocrystalline wafers, the main component of PV modules, are combined with anti-reflective coatings to maximize absorption. In addition to the anti-reflective coatings, the surfaces of PV panels are roughened, a process called "stippling." Stippled surfaces—also referred to as "dimpled" surfaces—diffuse reflection and, thus, reduce glare potential.

Land use and transportation measures could promote infill and transit-oriented development within the city centers that includes buildings with new sources of outdoor lighting. Further, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities that could increase light in the area due to outdoor facility lighting.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to create a new source of light or glare would have the same effect as described in the CWP FEIR. Mitigation Measure 4.12-2 would reduce light and glare effects for improvements in Community Plan areas. Mitigation Measure 4.12-4 would reduce lighting and glare effects for projects with significant parking lot improvements or with new lighting but may not always reduce all impacts to a less than significant level.

Thus, with the 2015 CAP Update, the CWP's impacts related to additional sources of lighting and glare would remain significant and unavoidable with mitigation.

## CWP FEIR Mitigation Measures

**Mitigation Measure 4.12-2**, as included in the certified CWP FEIR, requires the County to obtain funding for Program DES-1.a (Add Design Components to the Community Plans) and revise the time frame of its implementation to the medium-term or sooner. In addition, the Marin County Community Development Agency is responsible for revising design guidelines of community plans to be consistent with the Draft 2005 CWP Update. Refer to the CWP FEIR for the full text of Mitigation Measure 4.12-2.

**Mitigation Measure 4.12-4**, as included in the certified CWP FEIR, requires new development and projects that would make significant parking lot improvements or add new lighting would be required to prepare a lighting plan for design review by County staff in order to minimize light trespass, light pollution, and glare. Refer to the CWP FEIR for the full text of Mitigation Measure 4.12-4.

## Conclusion

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding aesthetics that were analyzed in the CWP FEIR.

## 2. Agricultural and Forestry Resources

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?
<b>Would the Project:</b> 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?	Impact 4.8-1, page 4.8-8	No	No	No	Yes, Mitigation Measure 4.8-1
b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?	Impacts 4.1-3, page 4.1-53, and 4.8-2, page 4.8-19	No	No	No	N/A

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?
c. Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	N/A	No	No	No	N/A
d. Result in the loss of forest land or conversion of forest land to non-forest use?	N/A	No	No	No	N/A
e. Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	N/A	No	No	No	N/A

## Discussion

**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?**

As described under Impact 4.8-1 in the CWP FEIR, the policies and programs of the CWP would result in the re-designation of 5,942 acres in the unincorporated area of the county from agricultural to non-agricultural, primarily open space. Some of these lands are classified as Farmland of Statewide Importance, Farmland of Local Importance, or Grazing Land. Even with implementation of Mitigation Measure 4.8-1, requiring the County to limit development of agricultural land to agricultural processing, retail sales, and visitor-serving uses, conversion of State and County designated agricultural lands would still result, representing a significant and unavoidable impact after mitigation.

Implementation of several of the 2015 CAP Update measures could similarly result in conversion of farmland. For example, renewable energy additions to existing structures and waste or reuse collection or management facilities could be constructed on agricultural lands. These new developments could result in the conversion of agricultural lands to non-agricultural uses.

2015 CAP Update measures supporting manure management and methane gas digesters would represent agricultural processing of energy and thus would not represent conversion of agricultural land to non-agricultural uses. 2015 CAP Update measures supporting carbon farming would result in enhancement of agricultural working lands.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to convert farmland to non-agricultural uses would have the same effect as described in the CWP FEIR. Even with adherence to the existing goals, policies, and programs (Goals AG-1 through AG-3, Policies AG-1.1 through AG-1.12, AG-2.1 through 2.3, AG-2.5, AG-2.6, AG-2.10, AG-3.1, AG-3.3, and Programs AG-1.a through AG-1.h, AG-1.k, AG-1.m, AG-1.p, AG-1.q, AG-2.a, AG-2.b, and AG-2.j through AG-2.m) contained in the CWP and the incorporation of Mitigation Measure 4.8-1 from the CWP FEIR, impacts on agricultural resources due to the CWP with the 2015 CAP Update would remain significant and unavoidable because of the conversions of the agricultural lands to non-agricultural uses.

Thus, with the 2015 CAP Update, the CWP's impact would remain significant and unavoidable with mitigation.

**b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?**

As described under Impact 4.8-2 in the CWP FEIR, four of the parcels to be redesignated from agricultural to open space under the CWP are under Williamson contracts. Open space is a compatible use for lands under Williamson Act contracts in Marin County. Additionally, the parcels' contracts expired in 2009, and the CWP FEIR concluded that agricultural operations would likely cease once the contracts expired. The resultant change of these lands to the compatible use of open space would not conflict with the Williamson Act contracts, and thus the impact was considered less than significant.

The 2015 CAP Update measures do not propose to change existing land use designations or zoning and anticipates that land uses would be consistent with the designations established by the CWP. If the underlying zoning allows, renewable energy power generation facilities (e.g., solar) are permitted on non-prime agricultural land that is not designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Therefore, as with the CWP, potential conflicts with existing zoning for agricultural use or a Williamson Act contract would be less than significant.

As described under Impact 4.1-3 in the CWP FEIR, the CWP could result in residential uses intruding into agricultural areas, where the residential uses could be incompatible with existing agricultural operations. County zoning permits small residential lots to be clustered together, surrounded by large agricultural areas, exposing the perimeter area to potential conflicts. Additionally, urban uses can intrude on agricultural uses along the boundaries of incorporated cities and towns and unincorporated communities. Policy SV-2.4 in the CWP would reduce this impact to a less-than-significant level.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to conflict with existing zoning for agricultural use would have the same effect as described in the CWP FEIR. Adherence to Policy SV-2.4 contained in the CWP would minimize impacts from the 2015 CAP Update related to existing agricultural zoning.

Thus, with the 2015 CAP Update, the CWP's impact on agricultural zoning would remain less than significant.

**c. Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

**and**

**d. Result in the loss of forest land or conversion of forest land to non-forest use?**

The 2015 CAP Update measures do not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the local General Plan Land Use Elements. Therefore, potential conflicts with existing zoning or rezoning of forest land or timberland resulting in a loss or conversion of forest land would result in no impact. No mitigation is required.

**e. Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?**

The 2015 CAP Update measures do not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the local General Plan Land Use Elements. None of the proposed GHG-reduction measures would directly result in the conversions of farmland to a non-agricultural use or forest land to a non-forest use. Therefore, there would be no impact. No mitigation is required.

## **CWP FEIR Mitigation Measures**

**Mitigation Measure 4.8-1**, as included in the certified CWP FEIR, requires the implementation of Mitigation Measures 4.1-4(a) and 4.1-4(b), which require the County to limit development of agricultural land to agricultural processing, retail sales, and visitor-serving uses while balancing the needed value added services to agricultural producers that improve the economic viability of agriculture in the County. Refer to the CWP FEIR for the full text of Mitigation Measure 4.8-1.

## **Conclusion**

Even though implementation of Mitigation Measure 4.8-1 would limit development of agricultural land to agricultural processing, retail sales, and visitor-serving uses, minor amounts of agricultural land could still be converted to a non-agricultural use under the CWP with implementation of the 2015 CAP Update. The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding agriculture and forestry resources that were analyzed in the CWP FEIR.

### 3. Air Quality

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?
<b>Would the Project:</b> a. Conflict with or obstruct implementation of the applicable air quality plan?	Impact 4.3-1, page 4.3-13	No	No	No	Yes, Mitigation Measure 4.3-1
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Impacts 4.3-4, page 4.3-23, and 4.3-5, page 4.3-24,	No	No	No	N/A
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	Initial Study VI.5.a, page 13	No	No	No	Yes, Mitigation Measures 4.2-1 through 4.2-24
d. Expose sensitive receptors to substantial pollutant concentrations?	Impacts 4.3-3, page 4.3-20, and 4.3-4, page 4.3-23	No	No	No	Yes, Mitigation Measures 4.3-3 (a through c)
e. Create objectionable odors affecting a substantial number of people?	Impact 4.3-3, page 4.3-20	No	No	No	Yes, Mitigation Measures 4.3-3 (a through c)

### Discussion

#### a. Conflict with or obstruct implementation of the applicable air quality plan?

Projects that result in an increase in population or employment growth beyond that identified in regional plans could result in increases in vehicle miles traveled (VMT) and subsequently increase mobile source emissions, which could conflict with the Bay Area Air Quality Management District's (BAAQMD) planning efforts. For example, if a plan or project's projected VMT increase is greater than its projected population increase, a plan would be in conflict with the applicable air quality plan.

As described under Impact 4.3-1 in the CWP FEIR, the increase in VMT associated with the CWP would exceed the rate of population growth in Marin County.

The 2015 CAP Update is intended to reduce GHG emissions generated within the County to contribute to global efforts to reduce the effects of climate change by, among other things, using alternatively fueled vehicles, reducing VMT, using renewable energy, reducing waste generation, and increasing water conservation. Although these reduction strategies were formulated to reduce greenhouse gases, they also act to improve overall air quality by reducing emissions of criteria pollutants. With implementation of the 2015 CAP Update measures, it is anticipated that annual VMT within the County in 2020 would be less than the baseline 2012 conditions analyzed in the 2015 CAP Update.<sup>1</sup>

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to conflict with or obstruct implementation of applicable air quality plans would have less effect than described in the CWP FEIR, due to additional efforts to reduce VMT.

The 2015 CAP Update includes transportation measures to improve air quality. These include measures to reduce vehicle fuel use by encouraging a shift in the mode used for transportation and reducing travel demand through smart land use and development. In addition, energy efficiency measures to reduce electricity use and renewable energy generation would reduce both GHG emissions and air pollutants at power plants generating electricity in the region. Energy efficiency measures in the 2015 CAP Update would also reduce natural gas combustion at residential and commercial land uses within the County, which would reduce local criteria air pollution. Therefore, the 2015 CAP Update would result in a benefit in terms of air pollutant emissions and no impact concerning conformance with the applicable air quality plans would result.

Adherence to policies and programs contained in the CWP (Goal AIR-1, AIR-3 through AIR-5, HS-3, Policies CD-1.1, CD-2.3, CD-2.5, CD-2.6, CD-3.1, DES-2.1, DES-3.1, DES-3.2, HS-3.2 through HS-3.4, HS-3.14, TR-2.1, TR-2.4, TR-3.1, TR-3.2, EN-1.1 through EN-1.4, EN-2.2, EN-2.3, EN 3.1 through EN-3.4, and Program TR-2.e) and incorporation of Mitigation Measure 4.3-1 from the CWP FEIR, will help to control and reduce VMT. The measures contained in the 2015 CAP Update are intended to further reduce VMT and thus would result in less air quality impacts than considered in the CWP FEIR.

**b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Construction**

As described under Impact 4.3-5 in the CWP FEIR, construction associated with land uses and development consistent with the CWP would result in emissions of dust and possibly toxic air contaminants (TACs). However, policies and programs within the CWP (Policies AIR-1.2 and AIR-1.3, and Programs AIR-1.b and AIR-1.g) along with existing regulations related to fugitive dust from construction would reduce this impact to a less-than-significant level.

Implementation of several of the proposed GHG-reduction measures that entail new or remodeled construction could result in short-term construction emissions. Some proposed 2015 CAP Update

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<sup>1</sup> Based on travel demand modeling, 2012 annual VMT attributable to the unincorporated County is estimated at approximately 382 million miles. For 2020 conditions with the 2015 CAP Update, the estimated annual VMT is approximately 375 million miles.

measures involve minor construction activities, such as water efficiency upgrades to existing buildings, but are not expected to result in substantial construction emissions. The proposed measures that are likely to result in construction emissions include those involving construction of new energy, transit, solid waste, or waste-to-energy facilities.

Construction emissions result in increased emissions of ozone-precursor pollutants (i.e., reactive organic gases [ROG] and nitrogen oxides [NO<sub>x</sub>]) and emissions of particulate matter (PM). Emissions of ozone precursors would result from the operation of construction equipment, construction worker vehicle trips, and truck hauling trips. Emissions of airborne PM are largely associated with ground-disturbing activities, such as site preparation. Localized concentrations of construction-generated emissions, including emissions of PM, can adversely impact nearby sensitive land uses.

The quantity of daily emissions, particularly ROG and NO<sub>x</sub> emissions, generated during construction would depend on the number of vehicles used and the hours of operation for specific construction activities. The significance of fugitive dust (PM) emissions would vary widely and would depend on a number of factors including the area of disturbed soil, the timing of disturbance, if structures would be demolished, if excavation is required, and if transportation of excavated material is required.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to violate air quality standards would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs contained in the CWP (Policies AIR-1.2 and AIR-1.3, and Programs AIR-1.b and AIR-1.g) would ensure that implementation of the 2015 CAP Update measures would not result in new significant impacts or substantially increase the severity of the impacts described in the CWP FEIR. Thus, with implementation of the 2015 CAP Update, the CWP's impact on air quality standards would remain less than significant.

### **Operation**

As described under Impact 4.3-4 in the CWP FEIR, traffic increases under the CWP would result in carbon monoxide concentrations that would be below ambient air quality standards at the most congested intersections. The impact on local air quality resulting from implementation of the CWP was considered less than significant.

The 2015 CAP Update contains measures that support energy-conserving programs and renewable energy generators, and encourage development in close proximity to transit. The 2015 CAP Update also includes measures to increase alternative fuel use and infrastructure in the County. These measures would help to reduce adverse air quality effects through the reduction of fossil fuel consumption and use of private motor vehicles.

In addition, proposed 2015 CAP Update measures related to transportation would reduce VMT, and, thus, automobile-generating air pollutants throughout the County. Implementation of the proposed 2015 CAP Update would reduce VMT in the County. A reduction of annual VMT would result in a benefit to air quality, because with fewer vehicle miles traveled, fewer criteria air pollutants are generated.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to violate air quality standards would have less effect as described in the CWP FEIR. Thus, with implementation of

the 2015 CAP Update, the CWP's operational impact on air quality standards would remain less than significant.

**c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?**

As described in the Marin Countywide Plan Update 2005 Revised Initial Study, policies contained within the CWP would continue to contribute to ozone for which the San Francisco Bay region currently is considered nonattainment at both the state and federal level. Policies within CWP section 3.4, *Community Development*, and 3.9, *Transportation*, encourage reduced vehicle trips, maintained level of service, and increased use of alternative transportation modes. CWP EIR Mitigation Measures 4.2-1 through 4.2-24 included under Section 16, *Transportation and Traffic*, of this Addendum address local air quality impacts resulting from development consistent with the CWP. In addition to reducing GHG emissions, many of the GHG-reduction measures in the 2015 CAP Update would also reduce criteria air pollutants through the substantial reduction of VMT and other measures. Therefore, the 2015 CAP Update would not contribute to cumulative increases in criteria pollutant and would actually reduce criteria air pollutant emissions. With implementation of the 2015 CAP Update, the CWP's impact on cumulative criteria pollution would remain less than significant.

**d. Expose sensitive receptors to substantial pollutant concentrations?**

As described under Impact 4.3-3 in the CWP FEIR, land uses designated in the CWP do not propose new sources of TACs, but do designate sensitive land uses near sources of TACs. As described under Impact 4.3-4 in the CWP FEIR, traffic increases under the CWP would result in carbon monoxide concentrations that would be below ambient air quality standards at the most congested intersections. With the implementation of Mitigation Measures 4.3-3(a), 4.3-3(b), and 4.3-3(c), which require CWP program additions and revisions to require separation between air pollution sources and other land uses and require analysis of potential health risks for projects involving sensitive receptors, the impacts would be reduced to a less-than-significant level.

In general, the GHG-reduction measures in the 2015 CAP Update would reduce the emission of TACs by reducing on-road emissions from both passenger and commercial vehicles. However, some GHG-reduction measures encourage the densification of development in city centers and along transit corridors. Increased density and development near transit centers could result in a larger concentration of vehicles (autos and buses) in a smaller area, thereby resulting in substantial TAC emissions near sensitive receptors. This is particularly true with transit-oriented development because emission sources, such as diesel-engines for buses and commuter trains, are intrinsically near sensitive receptors such as residential land uses.

The 2015 CAP Update does not include any measures that would expose sensitive receptors to substantial pollution concentrations beyond what was identified in the CWP because the 2015 CAP Update does not change land use designations or zoning for new residential or other sensitive receptor land uses.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to expose sensitive receptors to substantial pollutant concentrations, and result in unsafe carbon monoxide concentrations, would have the same effect as described in the CWP FEIR. Adherence to the existing

policy and program (Policy AIR-2.1 and Program AIR-2.a) contained in the CWP and the incorporation of Mitigation Measure 4.3-3(a), (b), and (c) from the CWP FEIR would minimize impacts from the 2015 CAP Update measures. Thus, with the 2015 CAP Update, the CWP's impact on sensitive receptor pollution exposure and carbon monoxide concentrations would remain less than significant with mitigation.

**e. Create objectionable odors affecting a substantial number of people?**

As described in the CWP FEIR under Impact 4.3-3, land uses designated in the CWP do not propose new sources of odors, but do designate sensitive land uses near sources of odors. With the implementation of Mitigation Measures 4.3-3(a) and 4.3-3(b), which include program additions and revisions to require separation between odor sources and other land uses, the impact would be reduced to a less-than-significant level.

In general, the GHG-reduction measures in the 2015 CAP Update would not create substantial permanent odors. Actions associated with increased waste diversion and an increase in capture and use of methane from landfills would support increased composting facilities that must be managed properly to prevent odor issues. Some measures encourage an increase in anaerobic digestion for dairy operations and the installation of methane digesters to capture methane emissions from the decomposition of manure. These measures would result in concentrated manure collection, which could result in odor concerns. However, dairies in Marin County are relatively small-scale and are an existing use. Therefore, it is not expected that changes in manure collection, or any of the other GHG-reduction measures, would result in a substantial odor issue. The 2015 CAP Update does not include any measures that would expose sensitive receptors to odor sources beyond those identified in the CWP.

The 2015 CAP Update measures are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to create objectionable odors would have the same effect as described in the CWP FEIR. Adherence to the existing policy and program (Policy AIR-2.1 and Program AIR-2.a) contained in the CWP and the incorporation of Mitigation Measure 4.3-3(a and b) from the CWP FEIR would minimize the impacts of the 2015 CAP Update measures so as not to result in new significant impacts or a substantial increase in the severity of the impacts considered in the CWP FEIR. Thus, with the 2015 CAP Update, CWP's impact on objectionable odors would remain less than significant with mitigation.

**CWP FEIR Mitigation Measures**

**Mitigation Measure 4.3-1**, as included in the certified CWP FEIR, requires the County to implement Mitigation Measure 4.2-1 of Impact 4.2-1 to reduce VMT per person. Refer to the CWP FEIR for the full text of Mitigation Measure 4.3-1.

**Mitigation Measure 4.3-3 (a through c)**, as included in the certified CWP FEIR, requires the County to implement the revised Policy AIR-2.1 and Program AIR-2.a to create buffers between emission sources and sensitive land uses. In addition, the County will implement a new program requiring a health risk analysis for projects involving sensitive receptors within 150 feet of freeways. Refer to the CWP FEIR for the full text of Mitigation Measure 4.3-3 (a through c).

## Conclusion

As discussed in the CWP FEIR, land uses and development consistent with the CWP (such as the measures proposed in the 2015 CAP Update) would result in a significant and unavoidable impact on air quality due to the increase in VMT within the County. The 2015 CAP Update measures include policies for land use, transportation, and off-road equipment specifically to reduce VMT generated in the County. The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding air quality that were analyzed in the CWP FEIR.

## 4. Biological Resources

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?
<b>Would the Project:</b> a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Impact 4.6-1, page 4.6-30	No	No	No	Yes, Mitigation Measure 4.6-1
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Impact 4.6-2, page 4.6-35	No	No	No	Yes, Mitigation Measure 4.6-2
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means?	Impact 4.6-3, page 4.6-40	No	No	No	N/A

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?
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Impact 4.6-4, page 4.6-42	No	No	No	Yes, Mitigation Measures 4.6-4(a and b)
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Impact 4.6-5, page 4.6-46	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?	Impact 4.6-6, page 4.6-47	No	No	No	N/A

## Discussion

**a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

There are numerous occurrences of both special-status plant and animal species within or at the periphery of urbanized areas in the County. Most known occurrences of special-status species are from outside urbanized areas, in permanent open space lands and in the vicinity of rural communities, or grazing and watershed lands. As described in CWP FEIR under Impact 4.6-1, land uses and development consistent with the CWP could impact special-status species through the direct loss of individuals or localized populations, elimination or degradation of essential habitat, and isolation of disjunct occurrences or subpopulations due to habitat fragmentation. The conversion of existing natural habitat to urban development, roadways, and other infrastructure improvements could result in the elimination of populations of special-status species where present within the limits of proposed grading and development. Further, even if a population is deliberately avoided, new development and intensively managed land practices (such as agricultural uses) could result in fragmentation of the existing habitat and leave the special-status species population at risk to extirpation.

Many of the 2015 CAP Update measures promote retrofits, additions, and modifications to existing structures and facilities and would not likely impact special-status species. However, several 2015 CAP Update measures could promote the construction of new structures or facilities in greenfield areas where special-status species may be present. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Although less likely, land use measures promoting infill and transit-oriented development within the city centers and transportation measures resulting in minor changes to existing roadways for additional transit, bicycle, or pedestrian facilities could also impact special-status species.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to impact special-status species would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs (Policies BIO-1.1, BIO-2.1, BIO-2.3, BIO-2.6, BIO-2.9, and BIO-2.10; Programs BIO-1.c, BIO-2.a, BIO-2.c, BIO-2.d, and BIO-5.d) contained in the CWP and implementation of CWP FEIR Mitigation Measure 4.6-1 would minimize impacts of the 2015 CAP Update related to special-status species. Thus, with the 2015 CAP Update, the CWP's impact on special-status species would remain less than significant with mitigation.

**b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Occurrences of sensitive natural communities in the County are from within or at the periphery of urbanized areas through city centers, particularly the riparian scrub and woodland habitat along streams and the remaining marshlands along the shoreline of San Francisco Bay and San Pablo Bay. Other occurrences of sensitive natural communities outside urbanized areas are from within open space lands or in the vicinity of rural communities, or grazing and watershed lands. As described in the CWP FEIR, under Impact 4.6-2, development and land uses consistent with the CWP could result in adverse impacts on sensitive natural communities through all or partial conversion to developed uses or intensively managed crops, and fragmentation and modification to such an extent that the resource no longer functions as a natural community. Further, insufficient setbacks from sensitive natural communities can also contribute to incremental loss and compromised habitat value.

Many of the 2015 CAP Update measures promote retrofits, additions, and modifications to existing structures and facilities and would not likely impact sensitive natural communities. However, several 2015 CAP Update measures could promote the construction of new structures or facilities in greenfield areas where sensitive natural communities may be present. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Although less likely, land use measures promoting infill and transit-oriented development within the city centers and transportation measures resulting in minor changes to existing roadways for additional transit, bicycle, or pedestrian facilities could also impact sensitive natural communities. Measures supporting carbon farming including measures such as a riparian zone planting that would enhance natural habitat value in agricultural working lands.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to impact sensitive natural communities would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs (Policies BIO-1.1 through BIO-1.3, BIO-2.1, BIO-2.3, BIO-2.9, BIO-

2.10, BIO-4.1, BIO-4.2, BIO-5.1, BIO-5.2, BIO-6, BIO-7, and BIO-9; Programs BIO-1.a through BIO-1.d, BIO-1.g, BIO-2.a, BIO-2.c, BIO-2.d, BIO-4.a, BIO-4.f through BIO-4.h, BIO-4.k, BIO-5.a, BIO-5.b, and BIO-5.g) contained in the CWP and implementation of CWP FEIR Mitigation Measure 4.6-2 would minimize impacts of the 2015 CAP Update related to sensitive natural communities. Thus, with the 2015 CAP Update, the CWP's impact on sensitive natural communities would remain less than significant with mitigation.

**c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means?**

Many of the known wetlands in the County occur within or near urban areas in the city center. These wetlands would be most vulnerable to potential direct impacts as a result of future development. Indirect impacts on wetlands and other jurisdictional waters include an increase in the potential for sedimentation due to construction grading and ground disturbance, an increase in the potential for erosion due to increased runoff volumes generated by impervious surfaces, and an increase in the potential for water quality degradation due to increased levels in nonpoint pollutants. As described under Impact 4.6-3 in the CWP FEIR, development and land use activities consistent with the CWP could result in direct loss of or modification to existing wetlands and unvegetated other waters, as well as indirect impacts due to water quality degradation.

Many of the 2015 CAP Update measures promote retrofits, additions, and modifications to existing structures and facilities and would not likely directly impact wetlands and jurisdictional other waters. Construction of these measures may indirectly impact wetlands and other waters through water quality degradation from construction activities. Several 2015 CAP Update measures could promote the construction of new structures or facilities in greenfield areas where wetlands and other waters may be present. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Likewise, land use measures promoting infill and transit-oriented development within the city centers and transportation measures resulting in minor changes to existing roadways for additional transit, bicycle, or pedestrian facilities could also impact wetlands and other waters. Measures supporting carbon farming would not significantly affect wetlands or water resources given the emphasis on protecting and enhancing riparian woodland corridors.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to impact wetlands and other waters would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs (Policies BIO-3.1, and BIO-3.2; Programs BIO-1.c, BIO-2.c, BIO-2.d, BIO-3.a through BIO-3.g, BIO-4.a, BIO-4.f through BIO-4.h, BIO-4.k, and BIO-5.a) contained in the CWP would minimize impacts of the 2015 CAP Update related to wetlands and other waters. Thus, with the 2015 CAP Update, the CWP's impact on wetlands and other waters would remain less than significant.

**d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

As described in CWP FEIR under Impact 4.6-4, development and land uses consistent with the CWP would result in a substantial reduction of existing natural habitat, contribute to habitat fragmentation, and result in obstruction of movement opportunities. This would be a significant and unavoidable impact, even with adherence to the existing policies and programs (Policies BIO-1.3

through BIO-1.9, BIO-2.4 through BIO-2.6; Programs BIO-1.c, BIO-1.e through BIO-1.g, BIO-2.b, BIO-5.a ) contained in the CWP and incorporation of CWP FEIR Mitigation Measure 4.6-4 (a and b). Although these policies, programs, and measures would partially mitigate potential adverse impacts on wildlife habitat and movement opportunities associated with implementation of the CWP, they collectively do not fully address or mitigate potential impacts of development and land use activities on existing natural habitat. Future development and land use activities would result in the conversion of existing habitat to urban and suburban uses, construction of new roadways and other infrastructure improvements, and the expansion of public trail and recreational facilities among other activities, all of which would still contribute to substantial adverse effects on wildlife habitat and movement opportunities in the county.

Many of the 2015 CAP Update measures promote retrofits, additions, and modifications to existing structures and facilities and would not likely impact wildlife habitat and movement opportunities. However, several 2015 CAP Update measures could promote the construction of new structures or facilities in greenfield areas where wildlife habitat and movement opportunities may be present. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Likewise, land use measures promoting infill and transit-oriented development within the city centers and transportation measures resulting in minor changes to existing roadways for additional transit, bicycle, or pedestrian facilities could also impact wildlife habitat and movement opportunities. Measures to support carbon farming would not result in conversion of agricultural land to urban uses or introduce impediments to wildlife corridors or nursery sites.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to impact wildlife habitat and movement opportunities would have the same effect as described in the CWP FEIR. Adherence to the policies mentioned above would minimize impacts related to wildlife habitat and movement opportunities, but CWP impacts with the 2015 CAP Update would remain significant and unavoidable. Thus, with the 2015 CAP Update, the CWP's impact on wildlife habitat and movement opportunities would remain significant and unavoidable with mitigation.

**e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

As described in the CWP FEIR under Impact 4.6-5, some aspects of development and land use activities consistent with the CWP conflict with goals, policies, and ordinances intended to protect sensitive biological resources.

Implementation of some of 2015 CAP Update measures may similarly conflict with goals, policies, and ordinances intended to protect sensitive biological resources. Many of the 2015 CAP Update measures promote retrofits, additions, and modifications to existing structures and facilities and would not likely impact sensitive biological resources. However, several 2015 CAP Update measures could promote the construction of new structures or facilities in greenfield areas or areas with resources that may conflict with goals, policies, and ordinances intended to protect sensitive biological resources. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Land use measures could promote infill and transit-oriented development within the city centers. Likewise, transportation measures could conflict with goals, policies, and ordinances intended to protect sensitive biological resources as a result of minor changes to existing roadways for additional

transit, bicycle, or pedestrian facilities. Measures to support carbon farming would not result in substantial loss of protected trees or habitat as they would seek to protect and expand riparian and sensitive area vegetation.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to conflict with goals, policies, and ordinances intended to protect sensitive biological resources would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs contained in the CWP would minimize impacts of the 2015 CAP Update related to biological resources. Policies and programs in the Natural Systems & Agriculture Element of the CWP include a requirement to conduct a site assessment, comply with agency requirements, and implement adequate mitigation (required by the County and trustee agencies where significant impacts are identified) where sensitive biological and wetland resources may be adversely affected. Any significant impacts would be identified for discretionary projects, and appropriate mitigation required as part of approval. Thus, with the 2015 CAP Update, the CWP's impact on local policies would remain less than significant.

**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?**

As described in CWP FEIR under Impact 4.6-6, development and land use activities consistent with the CWP would not conflict with any adopted habitat conservation plans or natural community conservation plans because there are no conservation plans adopted encompassing all or portions of the County. Likewise, because of the absence of these conservation plans, the 2015 CAP Update measures would also not conflict with any adopted habitat conservation plans or natural community conservation plans. Thus, with the 2015 CAP Update, the CWP would have no impact on any adopted habitat conservation plans or natural community conservation plans.

## **CWP FEIR Mitigation Measures**

**Mitigation Measure 4.6-1**, as included in the certified CWP FEIR, requires the County to adopt and implement a new program to continue to actively participate in the FishNet4C program and work cooperatively with participating agencies to implement recommendations to improve and restore aquatic habitat for listed anadromous fish species and other fishery resources. Refer to the CWP FEIR for the full text of Mitigation Measure 4.6-1.

**Mitigation Measure 4.6-2**, as included in the certified CWP FEIR, requires the County to obtain funding for CWP Program BIO-1.b (Develop Habitat Monitoring Programs), revise its priority to medium, and improve the time frame of its implementation to the medium-term or sooner to reduce the impact on sensitive natural communities. Refer to the CWP FEIR for the full text of Mitigation Measure 4.6-2.

**Mitigation Measure 4.6-4 (a and b)**, as included in the certified CWP FEIR, requires the County to provide expanded minimum boundaries for the proposed Baylands Corridor on the St. Vincent's/Silveira properties and to ensure implementation of essential programs necessary to identify and protect important wildlife habitat and movement opportunities. Further, the County would obtain additional funding for Program BIO-2.b (Conduct Habitat Connectivity Assessment) and revise the time frame of its implementation to the medium-term or sooner. Refer to the CWP FEIR for the full text of Mitigation Measure 4.6-4 (a and b).

## Conclusion

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding biological resources that were analyzed in the CWP FEIR.

## 5. Cultural Resources

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?
<b>Would the Project:</b> a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	Impact 4.11-1, page 4.11-10	No	No	No	Yes, Mitigation Measure 4.11-1
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	Impact 4.11-2, page 4.11-12	No	No	No	N/A
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Impact 4.11-2, page 4.11-12	No	No	No	N/A
d. Disturb any human remains, including those interred outside of formal cemeteries?	Impact 4.11-2, page 4.11-12	No	No	No	N/A

## Discussion

### a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

As described in the CWP FEIR under Impact 4.11-1, land uses and development consistent with the CWP could result in the disturbance of historical resources. Large residential structures have replaced historic ranches in rural areas. In city centers, historic homes in older subdivisions have been replaced or substantially altered. New development and redevelopment consistent with the CWP could further disturb historic resources through demolition, destruction, alteration, and structural relocation.

There are several measures in the 2015 CAP Update that have the potential to adversely affect historic resources through modification, alteration, or potential demolition. Energy efficiency and renewable energy measures encourage retrofits or renewable energy additions to existing structures. In the event these retrofits and renewable energy additions are implemented on historic structures, the resources could be disturbed through modification and alteration. Waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Further, land use and transportation measures could promote infill and transit-oriented development within the city centers. These redevelopments and new developments could result in the demolition of historic resources or adversely impact the attributes that qualify the resource as historic.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to adversely affect historic resources would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs (Policies HAR-1.1 through HAR-1.5, and HAR-2.1; Programs HAR-1.b, HAR-1.g through HAR-1.o, HAR-2.a, HAR-2.c, HAR-2.e, HAR-2.g, and HAR-2.h) contained in the CWP and implementation of Mitigation Measure 4.11-1 would minimize impacts of the 2015 CAP Update related to historic resources. Thus, with the 2015 CAP Update, the CWP's impact on historic resources would remain less than significant with mitigation

**b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?**

**c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**and**

**d. Disturb any human remains, including those interred outside of formal cemeteries?**

The majority of archeological sites in the County occur in rural areas and inland from the bay. Sites in urban areas are more susceptible to degradation than sites in rural areas, because more disruptive uses could occur in urban areas. As described in the CWP FEIR under Impact 4.11-2, excavation and grading activities resulting from development consistent with the CWP could result in substantial disturbances of archeological resources, the disturbance of human remains, or the destruction of unique paleontological resource.

Implementation of several 2015 CAP Update measures could result in the disturbance of these resources as a result of the ground-disturbing activities that would be required to construct facilities supported by the 2015 CAP Update. Waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Land use and transportation measures promote infill and transit-oriented development. Both types of measures would require ground-disturbing activities that could impact archeological and paleontological resources and human remains. Transportation measures promote additional transit, bicycle, or pedestrian facilities that could result in minor changes to existing streetscapes. Ground-disturbing activities required to accommodate these alternative transportation facilities could also impact archeological and paleontological resources and human remains. Measures supporting carbon farming would occur in areas already disturbed by ongoing agricultural activities.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to adversely affect archeological and paleontological resources and human remains would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs (Policies HAR 1.3 and HAR-2.2; Programs HAR-1.a, HAR-1.d through HAR-1.f, and HAR-2.d through HAR-2.f) contained in the CWP would minimize impacts from the 2015 CAP Update related to archeological and paleontological resources and human remains. Thus, with the 2015 CAP Update, the CWP’s impact on archaeological resources, paleontological resources, and human remains would remain less than significant.

### CWP FEIR Mitigation Measures

**Mitigation Measure 4.11-1**, as included in the certified CWP FEIR, requires the County to obtain additional funding for Programs HAR-1.g (Create a County Historical Commission), HAR1.l (Adopt Preservation Guidelines), and HAR-1.m (Require Design Compatibility) and revise the time frame of their implementation to the medium-term or sooner. Refer to the CWP FEIR for the full text of Mitigation Measure 4.11-1.

### Conclusion

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding cultural resources that were analyzed in the CWP FEIR.

## 6. Geology and Soils

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?
<b>Would the Project:</b> a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i. Rupture of a known earthquake fault?	Impact 4.7-1, page 4.7-17	No	No	No	Yes, Mitigation Measure 4.7-1 (a through c)
ii. Strong seismic ground shaking?	Impact 4.7-2, page 4.7-20	No	No	No	Yes, Mitigation Measure 4.7-2 (a through d)
iii. Seismic-related ground failure, including liquefaction?	Impact 4.7-3, page 4.7-24	No	No	No	Yes, Mitigation Measure 4.7-3 (a through c)

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?
iv. Landslides?	Impact 4.7-4, page 4.7-28	No	No	No	Yes, Mitigation Measure 4.7-4 (a and b)
b. Result in substantial soil erosion or the loss of topsoil?	Impacts 4.5-2, page 4.5-31, and 4.5-4, page 4.5-37	No	No	No	Yes, Mitigation Measure 4.5-4 (a through c)
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 an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	Impact 4.7-5, page 4.7-30	No	No	No	Yes, Mitigation Measure 4.7-3 and 4.7-5 (a through c)
d. Be located on expansive soil creating substantial risks to life or property?	Impact 4.7-6, page 4.7-32	No	No	No	Yes, Mitigation Measures 4.7-3 and 4.7-6 (a and b)
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	Impact 4.7-7, page 4.7-34	No	No	No	Yes, Mitigation Measures 4.7-7

## Discussion

### **a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) rupture of a known earthquake fault, ii) strong seismic ground shaking, iii) seismic-related ground failure, including liquefaction, and iv) landslides?**

Marin County is located in the seismically active San Francisco Bay Area, where the probability of at least one earthquake with a moment magnitude greater than 6.7 before 2032 is 62 percent. As described in the CWP FEIR under Impacts 4.7-1 through 4.7-4, land uses and development consistent with the CWP would expose people and structures to substantial adverse seismic effects, including the risk of loss, injury, or death involving ground surface rupture of a known active fault, ground shaking, ground failures, and landslides. This would be a significant and unavoidable impact, even with the existing provisions in the Marin County Development Code (Sections 19.04, 20.20, 23.08, and 24.04); incorporation of Mitigation Measures 4.7-1 (a through c), 4.7-2 (a through d), 4.7-3 (a through c), and 4.7-4 (a and b); and policies and programs contained in the CWP (Policies EH 1.1, EH-1.2, EH-2.1 through EH-2.3, PS-3.1, and PS-3.2; Programs EH-1.a through EH-1.e, EH-2.a

through EH-2.j, and PS-3.a through PS-3.j) because these provisions would not eliminate all structural damage, injuries, or death from seismic-related fault ruptures, ground shaking, ground failures, and landslides, especially for severe seismic events.

The measures in the 2015 CAP Update could promote the construction of new structures that people would occupy. For example, land use measures promote infill and transit-oriented development within the city centers. The specific siting of such development would be the same as identified in the CWP.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to expose people and structures to surface fault rupture, strong seismic ground shaking, seismic-related ground failures, and landslides would have the same effect as described in the CWP FEIR. With adherence to the policies and programs listed above, with the 2015 CAP Update, the CWP's impact related to risks associated with seismic hazards would remain significant and unavoidable with mitigation.

**b. Result in substantial soil erosion or the loss of topsoil?**

See discussion in Section 9, *Hydrology and Water Quality*, response to Question c.

**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 an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?**

As described in CWP FEIR under Impact 4.7-5, land uses and development consistent with the CWP would expose structures to ground subsidence and settlement. Damage to structures and improvements could be substantial because deposits prone to subsidence and settlement are present throughout the County, especially in the flatland areas adjacent to the bay. Localized subsidence and settlement in the County is commonly caused by induced loading (i.e., adding weight) on settlement-prone soils from grading and construction activities. In addition, strong seismic ground shaking from regional earthquakes could induce subsidence.

The 2015 CAP Update could promote the construction of new structures. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Land use measures could promote infill and transit-oriented development within the city centers.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to expose people and structures to subsidence and settlement hazards would have the same effect as described in the CWP FEIR. The risks associated with locating future development and redevelopment on soils susceptible to ground subsidence and settlement can be reduced substantially through geotechnical investigations, current design and construction methodologies, and site-specific design criteria in the Marin County Code. Adherence to these existing provisions contained in the Marin County Code (Sections 20.20, 23.08, and 24.04) and implementation of Mitigation Measures 4.7-3 and 4.7-5 (a and b) would minimize impacts from the 2015 CAP Update related to exposure to subsidence and settlement. Thus, with 2015 CAP Update, the CWP's impact related to landslides, lateral spreading, subsidence, liquefaction, or collapse would remain less than significant with mitigation.

**d. Be located on expansive soil creating substantial risks to life or property?**

Expansive soils are widely distributed throughout the County. Hazards associated with expansive soils are prevalent in the County, especially in the flatland areas adjacent to the bay. If not designed properly, light structures, roads, and pavements could be damaged by the seasonal shrinking and swelling of expansive soils and result in substantial cracks and differential movement. As described in CWP FEIR under Impact 4.7-6, development and redevelopment consistent with the CWP would expose structures to substantial adverse effects of expansive soils, including the risk of damage and possible loss of structures and property improvements.

The 2015 CAP Update could promote the construction of new structures. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Land use measures could promote infill and transit-oriented development within the city centers.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to be adversely affected by the siting of structures on expansive soils would have the same effect as described in the CWP FEIR. The risks associated with locating future development and redevelopment on expansive soils can be reduced substantially through geotechnical investigations, current design and construction methodologies, and site-specific design criteria in the Marin County Code. Adherence to the existing provisions contained in the Marin County Code (Sections 19.04 and 23.08) and implementation of Mitigation Measures 4.7-3 and 4.7-6 (a and b) would minimize impacts from the 2015 CAP Update related to the expansive soils. Thus, with the 2015 CAP Update, the CWP's impact related to locating development on expansive soils would remain less than significant with mitigation.

**e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?**

As described under CWP FEIR Impact 4.7-7, new development and redevelopment consistent with the CWP could occur within areas not serviced by sewer lines and would need to rely on onsite disposal systems. Some soils in the County are incapable of adequately supporting these systems and contain moderate to severe limitations. The use of septic tanks or alternative wastewater disposal systems in soils incapable of adequately supporting the use of these systems would cause damage to improvements and would adversely affect surface and groundwater resources.

The 2015 CAP Update would not promote the additional construction of structures requiring wastewater disposal services in areas not serviced by sewer lines and would need to rely on the use of septic tanks or alternative wastewater disposal systems. While land use measures would promote infill and transit-oriented development within the city centers, these areas are likely to be on centralized sewer systems and would be at the same locations identified in the CWP already.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to adversely affect surface and groundwater resources from soils incapable of adequately supporting septic systems would have the same effect as described in the CWP FEIR. Because some of the soils in the County are not well suited for septic systems, effective onsite wastewater management is essential and special planning, design and maintenance are required for proper disposal. Adherence to the existing policies and programs (Policies PFS-3.1 and PFS-3.2; Programs PFS-3.c through PFS-3.e,

WR-2.c through WR-2.f, and WR-2.h) contained in the CWP and implementation of Mitigation Measure 4.7-7 would minimize impacts from the 2015 CAP Update related to the use of septic systems in unsuitable soils. Thus, with the 2015 CAP Update, the CWP's impact on surface and groundwater resources from soils incapable of adequately supporting septic systems would remain less than significant with mitigation.

## **CWP FEIR Mitigation Measures**

**Mitigation Measure 4.7-1 (a through c)**, as included in the certified CWP FEIR, requires the County to revise Policy EH-2.2 (Comply with the Alquist-Priolo Act) and Program EH-2.d (Limit Building Sites in Alquist-Priolo Zones) to require that any development and redevelopment within the San Andreas Earthquake Fault Zones be properly evaluated and sited. In addition, the County is required to implement a new program to develop strategies to reduce the impact of surface fault rupture on critical public lifelines and access routes. Lastly, the County will continue to implement ordinances requiring geological assessment for new subdivisions and grading permits to identify the presence of surface fault rupture. Refer to the CWP FEIR for the full text of Mitigation Measure 4.7-1 (a through c).

**Mitigation Measure 4.7-2 (a through d)**, as included in the certified CWP FEIR, requires the County to revise the following policies and programs related to seismic safety, retrofit, and the location of emergency service facilities and create a new program to systematically assess damaged and collapsed buildings after a damaging earthquake (Policy EH-2.3 [Ensure Safety of New Structures], Program EH-2.e [Retrofit County Buildings and Critical Facilities], Program EH-3.f [Promote Structural and Nonstructural Safety], and Program 3.g [Locate Emergency Services Facilities Appropriately]). The measure requires the County to obtain funding and revise the time frame of implementation of Program EH-2.e (Retrofit County Buildings), to the medium-term or sooner. In addition, a new program will be implemented to create a process for systematic assessment of damaged and collapsed buildings immediately following a significant earthquake in order to determine recovery needs. The County also is required to obtain funding for the revised Program EH-2.e (Retrofit County Buildings and Critical Facilities) and revise the time frame of its implementation to the medium-term or sooner. Lastly, the County will continue to implement ordinances to ensure new construction utilize California Building Code seismic design requirements, seismic shut off devices, and anchoring of liquid petroleum gas tanks as well as require geological assessment for grading permits to determine the effects of seismic ground shaking on proposed grading. Refer to the CWP FEIR for the full text of Mitigation Measure 4.7-2 (a through d).

**Mitigation Measure 4.7-3 (a through c)**, as included in the certified CWP FEIR, requires the County to revise Programs EH-2.a (Require Geotechnical Reports) and EH-2.b (Require Construction Certification). In addition, the County is required to implement a new program to create Geologic Hazard Area maps based on the most up to date geologic and geotechnical information as it becomes available. Lastly, the County will continue to implement ordinances requiring geological assessment for new subdivisions and grading permits to identify hazards associated with seismic-related ground failure. Refer to the CWP FEIR for the full text of Mitigation Measure 4.7-3 (a through c).

**Mitigation Measure 4.7-4 (a and b)**, as included in the certified CWP FEIR, requires the County to adopt and implement revised programs (i.e., EH-2.a [Require Geotechnical Reports] and EH-2.b [Require Construction Observation and Certification]) and the new program (i.e., EH-2.[new])

[Geologic Hazard Areas]) in Mitigation Measure 4.7-3. In addition, the County will continue to implement ordinances requiring a Stability Report for new construction in specified areas on County slope stability maps, assessment of storm related landslide damage, limits to slope steepness. Lastly, the County will continue to implement County ordinances requiring geological assessment for new subdivisions and grading permits to identify hazards associated with landsliding. Refer to the CWP FEIR for the full text of Mitigation Measure 4.7-4 (a and b).

**Mitigation Measure 4.7-5 (a through c)**, as included in the certified CWP FEIR, requires the County to adopt and implement the revised programs (i.e., Programs EH-2.a [Require Geotechnical Reports] and EH-2.b [Require Construction Observation and Certification]) and the new program (i.e., EH-2.[new] [Geologic Hazard Areas]) in Mitigation Measure 4.7-3. In addition, the County is required to revise the time frame of implementation of Program EH-2.g to the medium-term or sooner. Lastly, the County will continue to implement ordinances that provide guidelines for subsidence evaluations of land that could be prone to subsidence as well as requiring geological assessment for new subdivisions and grading permits to identify hazards associated with subsidence and settlement. Refer to the CWP FEIR for the full text of Mitigation Measure 4.7-5 (a through c).

**Mitigation Measure 4.7-6 (a and b)**, as included in the certified CWP FEIR, requires the County to adopt and implement the revised programs (i.e., Programs EH-2.a [Require Geotechnical Reports] and EH-2.b [Require Construction Observation and Certification]) and the new program (i.e., EH-2.[new] [Geologic Hazard Areas]) in Mitigation Measure 4.7-3. In addition, the County will continue to implement ordinances that provide soil classification guidelines and design considerations for development in areas of expansive soils as well as requiring geological assessment for new subdivisions and grading permits to identify hazards associated with expansive soils. Refer to the CWP FEIR for the full text of Mitigation Measure 4.7-6 (a and b).

**Mitigation Measure 4.7-7**, as included in the certified CWP FEIR, requires the County to obtain funding for Program WR-2.e (Continue Providing High-Priority Inspections) in order to continue no-cost inspections of septic systems in high priority areas. Refer to the CWP FEIR for the full text of Mitigation Measure 4.7-7.

## Conclusion

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding geology and soils that were analyzed in the CWP FEIR.

## 7. Greenhouse Gas Emissions

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?
<b>Would the Project:</b> a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Impact 4.3-6, page 4.3-26	No	No	No	Yes, Mitigation Measure 4.3-6 (a and b)
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Impact 4.3-6, page 4.3-26	No	No	No	Yes, Mitigation Measure 4.3-6 (a and b)

### Discussion

**a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

and

**b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

The 2015 CAP Update is effectively the implementation of CWP Programs AIR-4.a through AIR 4.e (which require directly reducing GHG emissions from energy use in buildings, transportation, waste disposal, agriculture, and government contributions) and Mitigation Measure 4.3-6 (a and b) in the CWP FEIR (which requires the preparation of a GHG reduction plan and implementation of State programs to reduce GHG emissions). As described in CWP FEIR under Impact 4.3-6, land uses and development consistent with the CWP would result in an increase in GHG emissions over existing levels. The largest contributors to GHG emissions in the County are vehicular traffic and energy use in buildings. To reduce countywide GHG emissions, the 2015 CAP Update includes municipal and community measures and actions in the areas of energy efficiency and renewable energy; land use, transportation, and off-road equipment; waste reduction, reuse, and recycling; water conservation and wastewater treatment; and agriculture. The 2015 CAP Update would be implemented to meet the targets of reducing community GHG emissions to 30 percent below 1990 levels by 2020 and to reduce municipal GHG emissions to 15 percent below 1990 levels by 2020.

Although the CWP FEIR identified a significant and unavoidable impact in regards to GHG emissions in the County, implementation of the 2015 CAP Update would result in a beneficial impact because it would reduce the rate of increase in GHG emissions and set out policies to help achieve the County's GHG emission targets. Thus, the 2015 CAP Update would reduce GHG emissions and would be consistent with CWP goals, policies, and programs aimed at reducing GHG emissions in the county.

## CWP FEIR Mitigation Measures

**Mitigation Measure 4.3-6 (a and b)**, as included in the certified CWP FEIR, requires the County to adopt and implement the revised Program AIR-4f. In addition, the County is required to implement the proposed State programs to reduce GHG emissions, including the Renewable Portfolio Standards, California Fuel Efficiency (CAFE) standards, and a carbon cap and trade program. Refer to the CWP FEIR for the full text of Mitigation Measure 4.3-6 (a and b).

## Conclusion

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding greenhouse gas emissions that were analyzed in the CWP FEIR.

## 8. Hazards and Hazardous Materials

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?
<b>Would the Project:</b> a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Impact 4.10-1, page 4.10-9	No	No	No	Yes, Mitigation Measure 4.10-1 (a and b)
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?	Impact 4.10-1, page 4.10-9	No	No	No	Yes, Mitigation Measure 4.10-1 (a and b)
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Impact 4.10-2, page 4.10-10	No	No	No	Yes, Mitigation Measure 4.10-2 (a and b)

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?
d. Be located on a site that 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?	Impact 4.10-3, page 4.10-12	No	No	No	Yes, Mitigation Measure 4.10-3
e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area?	N/A	No	No	No	N/A
f. Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area?	N/A	No	No	No	N/A
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Section 2.6 (Effects of No Significance), page 2.0-53	No	No	No	N/A
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Impact 4.10-10, page 4.10-55	No	No	No	N/A

## Discussion

**a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

and

**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?**

Hazardous materials are regularly used, transported, and disposed of in the County. Although activities involving the regular use of hazardous materials are relatively well regulated and monitored in the County, accidental release as a result of accidents, misuse, or natural disasters could occur. As described in the CWP FEIR under Impact 4.10-1, additional residential, commercial, industrial, and public land uses and development consistent with the CWP would increase the amount of hazardous materials transported, used, and disposed of in the County and would also increase the likelihood of accident conditions involving the release of hazardous materials into the environment.

There are several 2015 CAP Update measures that promote development of structures or facilities that would require hazardous materials during construction. Energy efficiency and renewable energy measures encourage retrofits or renewable energy additions to existing structures. Transportation measures promote additional transit, bicycle, or pedestrian facilities. Water conservation and wastewater treatment measures encourage retrofits at existing facilities for efficiency. Agricultural measures encourage the installation of methane gas digesters at existing daily and livestock facilities. Construction associated with these retrofits, additions, and modifications would involve use of common hazardous materials associated with construction equipment and activities. Further, in addition to construction-period hazardous materials use, several 2015 CAP Update measures promote development of structures or facilities that would use or generate hazardous materials during operation and maintenance. Land use measures could promote infill and transit-oriented development within the city centers. Waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Small quantities of hazardous materials would be used during the operation and maintenance of these structures.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to increase the likelihood of accident conditions involving the release of hazardous materials into the environment would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs contained in the CWP (Policy PS-4.1, and Programs PS-4.a through PS-4.g), and incorporation of Mitigation Measure 4.10-1 (a and b) would minimize impacts from the 2015 CAP Update measures related to hazardous materials. Thus, with 2015 CAP Update, the CWP's impact related to the likelihood of accident conditions involving the release of hazardous materials into the environment would remain less than significant with mitigation.

**c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

There are a number of sites in Marin County that use and store hazardous materials. Many schools and other sensitive receptors in the County are located in the city-centers where hazardous

materials use, disposal, and transport would be the greatest. As described in the CWP FEIR under Impact 4.10-2, additional land uses and development consistent with the CWP could result in the use of hazardous materials within 0.25-mile of a school by industrial or commercial uses. Further, expansion of commercial and industrial uses could increase the amount of hazardous materials and waste generated at these facilities.

Several 2015 CAP Update measures could handle hazardous materials or waste within the proximity of an existing or proposed school, depending on the siting of facilities supported by the 2015 CAP Update. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities which would use hazardous materials as part of operation and maintenance and may also potentially generate hazardous waste. Further, land use measures could promote infill and transit-oriented development within the city centers that may also potentially use hazardous materials during operation and maintenance.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to use or emit hazardous materials in proximity to schools would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs contained in the CWP (Policies EJ-1.1 through EJ-1.4, and Programs PS-4.a, EJ-1.a through EJ-1.h), and incorporation of Mitigation Measure 4.10-2 (a and b) would minimize impacts from the 2015 CAP Update measures related to potential hazardous materials release near schools. Thus, with the 2015 CAP Update, the CWP's impact on hazardous materials in proximity to schools would remain less than significant with mitigation.

**d. Be located on a site that 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?**

There are no identified contaminated hazardous materials sites in the unincorporated areas of the County that could be developed consistent with the CWP. However, as described in the CWP FEIR under Impact 4.10-3, the potential for unknown hazardous waste to be encountered at a future development site could still exist.

There are several 2015 CAP Update measures that promote the construction of new structures and facilities that could be located on unknown hazardous materials sites. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Land use measures could promote infill and transit-oriented development within the city centers that may be located on a hazardous materials site.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to locate development on hazardous material sites would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs contained in the CWP (Policies EJ-1.1 through EJ-1.4, and Programs PS-4.a, EJ-1.a through EJ-1.g), and incorporation of Mitigation Measure 4.10-3 would minimize impacts from the 2015 CAP Update measures related to siting on a hazardous materials sites. Thus, with the 2015 CAP Update, the CWP's impact on siting development on hazardous materials site would remain less than significant with mitigation.

**e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area?**

and

**f. Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area?**

The County has one general aviation and one small craft airport: Gness Field located north of Novato (general aviation), and Marin Ranch (private small craft airport) in northern San Rafael. The Airport Land Use Plan for the Marin County Airport (Gness Field) was adopted in 1991 and activity levels at Gness Field have not changed substantially since 1987. Program NO-1.f of the CWP requires the review of new development proposals within two miles of Gness Field for consistency with the CWP. Activities promoted by the 2015 CAP Update measures would not result in a safety hazard for people residing or working in the vicinity of an airport. With adherence to Program NO1.f, with the 2015 CAP Update, the CWP would not result in any new impacts or substantially more severe impacts related to safety hazards for people residing or working near an airport.

**g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The County's adopted Emergency Operations Plan provides for procedures to be followed in response to emergency situations. As described in CWP FEIR, Section 2.6, *Effects of No Significance*, land use and development consistent with the CWP would not interfere with the County's emergency response or emergency evacuation plan. Similarly, activities promoted by the 2015 CAP Update measures would not impair or physically interfere with the County's Emergency Operations Plan. Thus, the 2015 CAP Update measures would not result in any new impacts or substantially more severe impacts with an adopted emergency response plan or emergency evacuation plan.

**h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

The California Department of Forestry rates portions of the County as either a high, very high, or extreme fire hazard. Many of the high risk areas in the County are interspersed with developed areas. As described in the CWP FEIR under Impact 4.10-10, new land uses and development consistent with the CWP would expose people and structures to wildland fires throughout the County, especially areas with steep slope, high fuel loads (i.e., dense vegetation), or inadequate emergency access.

Several 2015 CAP Update measures that promote the construction of new structures and facilities which may expose people or structures to the hazards of wildland fires. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities where people would be employed. Land use measures could promote infill and transit-oriented development within the city centers where people may reside or be employed.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to expose people or structures to risks involving wildland fires would have the same effect as described in the CWP

FEIR. Adherence to the existing policies and programs contained in the CWP (Policies EH-4.1 through EH-4.4, and Programs EH-4.c, EF-4.e, EF-4.f, and EF-4.k) would minimize impacts from the 2015 CAP Update measures related to wildland fire hazards. Thus, with the 2015 CAP Update, the CWP’s impact on exposure to risks involving wildland fires would remain less than significant.

### CWP FEIR Mitigation Measures

**Mitigation Measure 4.10-1 (a and b)**, as included in the certified CWP FEIR, requires the County to adopt and implement new programs to facilitate public education regarding the safe use, transport, and disposal of hazardous materials and to encourage the use of less-toxic or non-toxic materials as a substitute and to inform and encourage the public to use the available hazardous waste disposal facilities in Marin County. Refer to the CWP FEIR for the full text of Mitigation Measure 4.10-1 (a and b).

**Mitigation Measure 4.10-2 (a and b)**, as included in the certified CWP FEIR, requires the County to revise Policy EJ-1.1 (Identify and Target Impacted Areas) to ensure that mapping would locate known sources of hazardous materials. In addition, the County is required to obtain funding for program EJ-1.a (Investigate a Possible Nexus) and revise the time frame of implementation for programs PS-4.a (Regulate Development Near Waste Sites), EJ-1.g (Deny Pollution-Source Proposals), and EJ-1.h (Require Pollution Analysis) to the medium-term or sooner. Refer to the CWP FEIR for the full text of Mitigation Measure 4.10-2 (a and b).

**Mitigation Measure 4.10-3**, as included in the certified CWP FEIR, requires the County to revise Policy EJ-1.1 (Identify and Target Impacted Areas) to ensure that mapping would locate known sources of hazardous materials. Refer to the CWP FEIR for the full text of Mitigation Measure 4.10-3.

### Conclusion

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding hazards and hazardous materials that were analyzed in the CWP FEIR.

### 9. Hydrology and Water Quality

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?
<b>Would the Project:</b> a. Violate any water quality standards or waste discharge requirements?	Impact 4.5-1, page 4.5-23	No	No	No	Yes, Mitigation Measure 4.5-1 (a and b)

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?
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or a lowering of the local groundwater table level?	Impact 4.5-3, page 4.5-32	No	No	No	Yes, Mitigation Measure 4.5-3 (a and b)
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite or offsite?	Impacts 4.5-2, page 4.5-31, and 4.5-4, page 4.5-37	No	No	No	Yes, Mitigation Measure 4.5-4 (a through c)
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite?	Impacts 4.5-2, page 4.5-31, and 4.5-4, page 4.5-37	No	No	No	Yes, Mitigation Measure 4.5-4 (a through c)
e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Impact 4.5-5 page 4.5-41	No	No	No	Yes, Mitigation Measure 4.5-5
f. Otherwise substantially degrade water quality?	Impact 4.5-1, page 4.5-23	No	No	No	Yes, Mitigation Measure 4.5-1 (a and b)

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?
g. Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Impact 4.5-7, page 4.5-46	No	No	No	Yes, Mitigation Measure 4.5-4(a) and 4.5-7 (a through c)
h. Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	Impact 4.5-7, page 4.5-46	No	No	No	Yes, Mitigation Measure 4.5-4(a) and 4.5-7 (a through c)
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	Impact 4.5-7, page 4.5-46	No	No	No	Yes, Mitigation Measure 4.5-4(a) and 4.5-7 (a through c)
j. Inundation by seiche, tsunami, or mudflow?	Impact 4.7-8, page 4.7-36	No	No	No	Yes, Mitigation Measure 4.7-8 (a and b)

## Discussion

### a. Violate any water quality standards or waste discharge requirements?

and

### f. Otherwise substantially degrade water quality?

The main factors that degrade and contribute to the violation of water quality standards in the County include nonpoint source pollution (such as the development, operation, and maintenance of residential, commercial, industrial, and public land uses), agricultural production activities (e.g., hay farming, grazing, and dairies), and improperly maintained septic systems. As described in the CWP FEIR under Impact 4.5-1, land uses and development consistent with the CWP would introduce additional pollutants to downstream waters. These pollutants would result in adverse changes to the water quality of the County’s natural and artificial drainage ways.

There are several 2015 CAP Update measures that could promote the construction of structures or facilities that could degrade water quality through pollution from construction activities. Energy efficiency and renewable energy measures encourage retrofits or renewable energy additions to existing structures. Transportation measures promote additional transit, bicycle, or pedestrian facilities that could result in minor changes to existing streetscapes. Water conservation and

wastewater treatment measures encourage retrofits at existing facilities for efficiency. Agricultural measures encourage the installation of methane gas digesters at existing dairy and livestock facilities. Construction associated with these retrofits, additions, and modifications could degrade water quality through the construction equipment and activities. Further, in addition to construction-period pollution, several 2015 CAP Update measures that promote structures or facilities that would may result in permanent sources of pollution during operation and maintenance. Land use measures could promote infill and transit-oriented development within the city centers. Waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Measures to support carbon farming would enhance agricultural productivity and aboveground and belowground vegetation growth which would, if anything, reduce erosion potential on those lands.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to increase polluted stormwater runoff contributing to water quality standards violations or degraded water quality would have the same effect as described in the CWP FEIR. The CWP contains several policies and programs that would reduce adverse effects to water quality from nonpoint source pollution (polluted stormwater) and improperly maintained septic systems such as reducing the use of pesticides and fertilizers, minimize erosion and downstream sedimentation, and provide public education and outreach to reduce residential nonpoint source pollution. Existing Marin County Code provisions and Stormwater Pollution Prevention Plan (SWPPP) requirements would also ensure that BMPs are incorporated into project construction and post-construction erosion control measures are in place to reduce impacts on water quality. Adherence to the existing policies and programs (Policies CD-1.3, CD-5.1, WR-1.1, WR-1.3, WR-1.4, WR-2.1 through WR-2.5, AG-1.13, BIO-4.1 through BIO-4.5, BIO-4.7 through BIO-4.9, BIO-4.16, BIO-5.2, BIO-5.4, and BIO-5.10; Programs CD-1.c, CD-4.b, WR-1.a through WR-1.f, WR-2.a through WR-2.k, BIO-4.a, BIO-4.b, BIO-5.e, and BIO-5.f) contained in the CWP, existing provisions contained in the Marin County Code (Section), and implementation of Mitigation Measure 4.5-1 (a and b) would minimize impacts from the 2015 CAP Update related to water quality. Thus, with the 2015 CAP Update, the CWP's impact on polluted stormwater runoff contributing to water quality standards violations or degrade water quality would remain less than significant with mitigation.

**b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or a lowering of the local groundwater table level?**

As discussed in the CWP FEIR under Impact 4.5-3, land uses and development consistent with the CWP would result in additional impervious surfaces which decreases the land area available for rainfall infiltration and diverts groundwater to surface water thereby reducing groundwater recharge in some County watersheds. This reduction in groundwater recharge could affect the yield of downslope wells and have adverse effects on sensitive plant communities.

Many of the 2015 CAP Update measures promote retrofits, additions, and modifications to existing structures and facilities that would not result in substantial new impervious surfaces. However, several 2015 CAP Update measures could promote the construction of structures may result in substantial new impervious surfaces that could impact groundwater recharge. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Land use measures could promote infill and transit-oriented development within the city centers.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to increase impervious surfaces and impact groundwater recharge would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs (Policies BIO-4.16, WR-1.1, WR-1.3, and WR-1.4; Programs WR-1.a, WR-1.b, WR-2.b, and PFS-2.o) contained in the CWP, existing provisions contained in the Marin County Code (Sections 23.18 and 24.04), and implementation of Mitigation Measure 4.5-3 (a and b) would minimize impacts from the 2015 CAP Update related to water quality. Thus, with the 2015 CAP Update, the CWP's impact on impervious surfaces and groundwater recharge would remain less than significant with mitigation.

**c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite or offsite?**

and

**d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite?**

As described in the CWP under FEIR Impacts 4.5-2 and 4.5-4, land uses and development consistent with the CWP would involve construction and grading activities that could alter drainage patterns and result in erosion and downstream sedimentation in County waterways. Additionally, implementation of land uses consistent with the CWP would result in additional impervious surface areas that would increase peak flow rates and lead to potential flooding. Further, increased peak flow rates could exacerbate hillside or channel/floodplain erosion and downstream sedimentation.

There are several 2015 CAP Update measures that promote the construction of structures or facilities that could result in flooding, soil erosion and downstream sedimentation from construction activities. Energy efficiency and renewable energy measures encourage retrofits or renewable energy additions to existing structures. Transportation measures promote additional transit, bicycle, or pedestrian facilities that could result in minor changes to existing streetscapes. Water conservation and wastewater treatment measures encourage retrofits at existing facilities for efficiency. Agricultural measures encourage the installation of methane gas digesters at existing dairy and livestock facilities. Further, in addition to construction-period impacts, several 2015 CAP Update measures that promote structures or facilities could result in an alteration of local drainage patterns that could result in flooding, soil erosion and downstream sedimentation. Land use measures could promote infill and transit-oriented development within the city centers. Waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Measures to support carbon farming would reduce soil erosion potential by increasing aboveground and below ground vegetation growth as well as riparian planting and protection.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to alter drainage patterns and result in substantial erosion, sedimentation, and flooding would have the same effect as described in the CWP FEIR. Existing Marin County Code provisions, National Pollutant Discharge Elimination System (NPDES) Phase II permit requirements, and SWPPP requirements would protect water quality from erosion and sedimentation during and after construction projects. Adherence to the existing policies and programs (Policies WR-1.1 through WR-1.4, WR-2.3 through WR-2.5, BIO-

4.1, BIO-4.2, BIO-4.4, BIO-4.5, BIO-4.7 through BIO-4.13, BIO-4.15, BIO-4.16, AG-1.5, AG-1.10, and MIN-1.5; Programs WR-1.a through WR-1f, WR-2.b, WR-2.k, BIO-4.a, BIO-4.f through BIO-4.k, AIR-5.b, EH-3.a, EH-3.e, EH-3.f, EH-3.j, TRL-2.b, AG-1.a) contained in the CWP, existing provisions contained in the Marin County Code (Sections 23.18 and 24.04), and implementation of Mitigation Measure 4.5-4 (a through c) would minimize impacts from the 2015 CAP Update. Thus, with the 2015 CAP Update, the CWP's impact on drainage patterns and erosion, sedimentation, and flooding would remain less than significant with mitigation.

**e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

As described in the CWP FEIR under Impact 4.5-5, implementation of the land uses and development consistent with the CWP would result in additional impervious surfaces that would increase both peak flow rates of stormwater runoff and erosion and downstream sedimentation. These increases would reduce the capacity of drainage ways and could result in flood flows that exceed existing downstream channel or stormwater system capacities. Further, site development typically involves compaction of soils that would also reduce stormwater infiltration in areas not covered by impervious surfaces. As peak flow rates increase, so does the scour potential of storm flows; this typically leads to erosion and downstream sedimentation within drainage and flood channels.

Many of the 2015 CAP Update measures promote retrofits, additions, and modifications to existing structures and facilities that would not result in substantial new impervious surfaces. However, several 2015 CAP Update measures could promote the construction of structures that may result in substantial new impervious surfaces that could contribute runoff that would exceed the capacity of existing stormwater drainage systems. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities. Land use measures could promote infill and transit-oriented development within the city centers. Measures to support carbon farming would not create new impervious surfaces and would, if anything increase water retention in farming landscapes.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to increase impervious surfaces and result in additional runoff that would exceed the capacity of existing stormwater drainage systems would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs (Policies CD-1.3, CD-5.1, CD-5.2, WR-1.1, WR-1.3, WR-1.4, WR-2.1, WR-2.3, BIO-4.4, BIO-4.9, EH-3.2, and PFS-1.4; Programs CD-1.c, CD-5.g, DES-3.b, DES-4.e, EH-3.f, and TR-4.a) contained in the CWP, existing provisions contained in the Marin County Code (Sections 23.18), and implementation of Mitigation Measure 4.5-5 would minimize impacts from the 2015 CAP Update related to water quality. Thus, with the 2015 CAP Update, the CWP's impact on impervious surfaces and runoff would remain less than significant with mitigation.

**g. Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

**h. Place within a 100-year flood hazard area structures that would impede or redirect flood flows?**  
**and**

**i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?**

Areas subject to flooding include areas along the County's shoreline or those immediately adjacent to low-lying terrain where flooding is influenced by tide heights. These areas encompass the major creek outlets along San Francisco Bay and the southern end of Tomales Bay. Likewise, these areas could also be affected by rising sea level elevations. As described in the CWP FEIR under Impact 4.5-7, land uses and development consistent with the CWP would result in the development of residential or commercial structures in floodplains, exposing people and structures to flood hazards. Similar development could occur in shoreline areas and would also be subject to flooding due to extreme high tides or watershed flooding (due to levee or dam failure) and sea level rise associated with global warming would exacerbate these risks.

Several 2015 CAP Update measures could promote the construction of structures in which people could reside or work. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities where people would be employed. Land use measures could promote infill and transit-oriented development within the city centers where people may reside or be employed.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to expose people or structures to flooding hazards would have the same effect as described in the CWP FEIR. The risks associated with locating future development and redevelopment in flood-prone areas would be reduced substantially through policies and programs in the CWP implemented to preserve storm drain system capacity or designate standard conditions of approval (SCAs) that establish development setbacks from streams. Existing Marin County Code provisions and NPDES Phase II permit requirements would also ensure that peak flow controls would be incorporated into project design to reduce impacts from flooding. Adherence to the existing policies and programs (Policies CD-1.3, CD-5.1, WR-1.1, WR-1.3, WR-1.4, WR-2.3, BIO-4.1, BIO-4.2, BIO-4.4, BIO-4.7 through BIO-4.9, BIO-4.14, EH-3.2, and EH-3.3; Programs CD-1.c, CD-5.g, DES-3.b, DES-4.e, EH-3.f, EH-3.k, AIR-5.c, and BIO-4.f through BIO-4.k) contained in the CWP, existing provisions contained in the Marin County Code (Sections 23.09 and 23.18), and implementation of Mitigation Measures 4.5-4(a) and 4.5-7 (a and b) would minimize impacts from the 2015 CAP Update related to flooding hazards. Thus, with the 2015 CAP Update, the CWP's impact on exposing people or structures to flooding hazards would remain less than significant with mitigation.

**j. Inundation by seiche, tsunami, or mudflow?**

As described in the CWP FEIR under Impact 4.7-8, new land uses and development consistent with the CWP in close proximity to the Pacific Ocean and San Francisco Bay would expose people and structures to the risk of tsunami and seiches generated by high-magnitude earthquakes. This would be a significant and unavoidable impact, even with adherence to the existing policies and programs (Policy EH-2.4; Programs EH-2.k, EH-3.a, EH-3.b, EH-3.d, and EH-3.g) contained in the CWP and

incorporation of Mitigation Measure 4.7-8 (a and b). Although these policies, programs, and measures would substantially reduce the exposure of people and structures to minor and moderate tsunami and seiche events in the County through public education, community preparedness, and more damage resistant structures, and more informed land use planned, people and development in low-lying areas would still experience substantial damage, loss, injury, or death in the event of a severe tsunami.

Several 2015 CAP Update measures could promote the construction of structures in which people would reside or work. For example, waste reduction, reuse, and recycling measures promote the construction of new waste recycling or reuse collection or management facilities where people would be employed. Land use measures could promote infill and transit-oriented development within the city centers where people may reside or be employed.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to expose people or structures to substantial adverse effects of tsunamis or seiches would have the same effect as described in the CWP FEIR. Buildout of the CWP and impacts related to inundation by tsunami or seiche would not be fully mitigated even with incorporation of existing policies and programs and mitigation measures. Thus, with the 2015 CAP Update, the CWP's impact on expose people or structures to substantial adverse effects of tsunamis and seiches would remain significant and unavoidable with mitigation.

## **CWP FEIR Mitigation Measures**

**Mitigation Measure 4.5-1 (a and b)**, as included in the certified CWP FEIR, requires the County to amend Program WR-2.i (Establishing a Septic Inspection, Monitoring, and Maintenance District) to reduce adverse effects on water quality to the maximum extent practical for new development and redevelopment projects. In addition, the County will continue to implement existing ordinances addressing nonpoint source pollution, erosion and sediment control, and surface runoff pollution control plans to ensure that project-related and cumulative impacts on water quality standards are minimized or avoided through conditions on project approval. Refer to the CWP FEIR for the full text of Mitigation Measure 4.5-1 (a and b).

**Mitigation Measure 4.5-3 (a and b)**, as included in the certified CWP FEIR, requires the County to revise the time frame of implementation of Program PFS-2.o to the medium-term or sooner. In addition, the County will continue to implement existing ordinances that maintain continued groundwater recharge and require surface runoff pollution control plans and best management practices for new developments and redevelopments to ensure that project-related and cumulative impacts on groundwater recharge are minimized or avoided through conditions on project approval. Refer to the CWP FEIR for the full text of Mitigation Measure 4.5-3 (a and b).

**Mitigation Measure 4.5-4 (a through c)**, as included in the certified CWP FEIR, requires the County to adopt an additional policy to minimize the adverse effects of increased peak flow rates and storm drain discharges from development. In addition, the County is required to continue to implement NPDES Phase II permit requirements relating to peak flow controls to ensure that project-related and cumulative impacts on peak flows are minimized or avoided through conditions on project approval as required by the ordinances. Lastly, the County also is required to implement Mitigation Measures 4.5-1(b) and 4.5-3(b) relating to infiltration and peak flow rate control to reduce impacts from erosion and downstream sedimentation in Marin County drainage ways. Refer to the CWP FEIR for the full text of Mitigation Measure 4.5-4 (a through c).

**Mitigation Measure 4.5-5**, as included in the certified CWP FEIR, requires the County to implement Mitigation Measures 4.5-1(b), 4.5-3(b), and 4.5-4(b) to minimize the potential impact of flooding from undersized stormwater drainage system capacity. Refer to the CWP FEIR for the full text of Mitigation Measure 4.5-5.

**Mitigation Measure 4.5-7 (a through c)**, as included in the certified CWP FEIR, requires the County to implement Mitigation Measures 4.5-3(b) and 4.5-4(b). In addition, the County will obtain additional funding necessary to implement Program AIR-5.c and the Marin County Development Code will be amended to include construction standards for areas threatened by future sea level rise. Lastly, the County will continue to implement ordinances that regulate floodplain development to ensure that project-related and cumulative impacts regarding flooding are minimized or avoided through conditions on project approval to reduce the exposure of people or structures to flood hazards. Refer to the CWP FEIR for the full text of Mitigation Measure 4.5-7 (a through c).

**Mitigation Measure 4.7-8 (a and b)**, as included in the certified CWP FEIR, requires the County to revise Policy EH-2.4 (Protect Coastal Areas from Tsunamis) to address tsunami wave runup and inundation impacts when reviewing proposed development along coastal areas of Marin County when inundation maps become available. In addition, the County will revise Programs EH-3.a (Regulate Development in Flood and Inundation Areas) and EH-3.g (Locate Critical Facilities Safely) to continue to require that new development and improvements be more resistant to damage and to require that critical facilities be located outside of tsunami hazard areas. In addition, it is necessary for the County to participate in the National Weather Service’s TsunamiReady program, which promotes tsunami hazard preparation in coastal communities. Refer to the CWP FEIR for the full text of Mitigation Measure 4.7-8 (a through b).

**Conclusion**

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding hydrology and water quality that were analyzed in the CWP FEIR.

**10. Land Use and Planning**

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?
<b>Would the Project:</b> a. Physically divide an established community?	Section 2.6 (Effects of No Significance), page 2.0-52	No	No	No	N/A

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?
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Impact 4.1-1, page 4.1-21	No	No	No	N/A
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	Impact 4.6-6, page 4.6-47	No	No	No	N/A

## Discussion

### a. Physically divide an established community?

As described in CWP FEIR, Section 2.6, *Effects of No Significance*, land use and development consistent with the CWP would not result in dividing an established community. Similarly, no activities promoted by the 2015 CAP Update measures would result in any major land use changes that would divide an established community. Thus, with the 2015 CAP Update, the CWP’s impact on an established community would remain less than significant.

### b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

As described in the CWP FEIR under Impact 4.1-1, there is no inconsistency between the CWP and the community plans, the Marin County Local Coastal Program, or other relevant plans and programs that could result in adverse physical impacts.

The 2015 CAP Update could result in construction of energy efficiency retrofits or renewable energy additions to existing structures, waste recycling or reuse collection or management facilities, and infill and transit-oriented development that could change existing land uses or pose land use compatibility issues. However, the 2015 CAP Update has been prepared to be consistent with the CWP and the measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. Therefore, the potential for the 2015 CAP Update measures to conflict with applicable land use policies to avoid or mitigate an environmental effect would have the same effect as described in the CWP FEIR. Thus, with the 2015 CAP Update, the CWP’s impact on land use plans, policies, and regulations adopted to avoid or mitigate environmental effects would remain less than significant.

**c. Conflict with any applicable habitat conservation plan or natural community conservation plan?**

See discussion in Section 4, *Biological Resources*, response to Question f.

**CWP FEIR Mitigation Measures**

There are no applicable mitigation measures.

**Conclusion**

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding land use and planning that were analyzed in the CWP FEIR.

**11. Mineral Resources**

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?
<b>Would the Project:</b> 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?	Section 2.6 (Effects of No Significance), page 2.0-52	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?	Section 2.6 (Effects of No Significance), page 2.0-52	No	No	No	N/A

**Discussion**

**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?**

and

**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?**

The CWP includes policies and programs that would continue to protect mineral resources through development restriction within the Marin County Development Code. Specifically, CWP Policies MIN-1.1 and MIN-1.3 would prohibit any temporary or permanent land uses that would preclude eventual extraction of the mineral resource and would require the creation of buffer land uses between the potential extraction areas and surrounding areas.

As described in CWP FEIR, Section 2.6, *Effects of No Significance*, land use and development consistent with the CWP would not result in the loss of significant mineral resources from premature development or other land uses that are incompatible with mineral extraction. The 2015 CAP Update has been prepared to be consistent with the CWP and the measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. No activities promoted by the 2015 CAP Update measures would result in the extraction of mineral resources or be located on a mineral resources site. Thus, with the 2015 CAP Update, the CWP’s impact on mineral resources would remain less than significant.

### CWP FEIR Mitigation Measures

There are no applicable CWP FEIR mitigation measures for mineral resources.

### Conclusion

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase the severity of the impacts regarding mineral resources that were analyzed in the CWP FEIR.

### 12. Noise

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?
<b>Would the Project:</b> a. Expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	Initial Study Section VI.10.a., page 19	No	No	No	Yes, Mitigation Measure 4.4-5
b. Expose persons to or generate excessive groundborne vibration or groundborne noise levels?	N/A	No	No	No	N/A
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Impacts 4.4-1, page 4.4-13, 4.4-3, page 4.4-15, and 4.4-4, page 4.4-15	No	No	No	N/A

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?
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Impact 4.4-5, page 4.4-18	No	No	No	Yes, Mitigation Measure 4.4-5
e. Be located within an airport land use plan area, or, where such a plan has not been adopted, within two miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?	Impact 4.4-2, page 4.4-14	No	No	No	N/A
f. Be located in the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels?	Impact 4.4-2, page 4.4-14	No	No	No	N/A

## Discussion

### **a. Expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?**

As described in the Marin Countywide Plan Update 2005 Revised Initial Study, policies contained within the CWP would not lead to increased ambient noise levels. However, development consistent with the CWP would contribute to increased noise. Policies in CWP Section 3.10, *Noise* (Policies NO-1.1, NO-1.2, and NO-1.3), are intended to mitigate the exposure of people to increased noise levels in excess of adopted standards and regulate construction noise sources. The analysis under Impacts 4.4-1 through 4.4-5 in the CWP FEIR finds that CWP policies and mitigation measures minimize the impacts on noise levels. These policies and mitigations would also apply to any new development supported by 2015 CAP Update measures. With the 2015 CAP Update, the CWP’s impact on noise levels in excess of local standards would remain less than significant with mitigation.

### **b. Expose persons to or generate excessive groundborne vibration or groundborne noise levels?**

Generation of groundborne vibration and noise is generally related to construction activities that involve pile driving. Some 2015 CAP Update measures may result in the construction of renewable energy additions to structures, development of waste recycling or reuse collection or management

facilities, energy efficiency retrofits, and infill and transit-oriented development. However, it is unlikely that construction activities promoted by the 2015 CAP Update measures would require extensive pile driving for deep underground facilities or excavation. Further, there are no long-term operational activities that would generate excessive groundborne vibration and noise levels associated with implementation of the 2015 CAP Update measures. With the 2015 CAP Update, the CWP would still have no impact.

**c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

As described in the CWP FEIR under Impact 4.4-1, although small noise level increases would occur, the impact would be less than significant. This conclusion was based on traffic noise modeling along the county's primary arterials and state highways. Individual projects consistent with the CWP would locally increase traffic noise, but Policy NO-1.2 and Program NO-1.c in the CWP require transportation activities and developments to reduce noise generation to acceptable levels.

As described in the CWP FEIR under Impact 4.4-3, industrial or other development consistent with the CWP would not result in significant stationary noise sources, making this impact less than significant. Additionally, Program NO-1.a in the CWP limits noise from new development through the requirement of siting, design, and insulation of new development so as not to exceed acceptable noise levels.

As described in the CWP FEIR under Impact 4.4-4, the Housing Overlay Designation in the 2015 CAP Update would concentrate residential development along some major roadways with the potential for exposure to high noise levels. However, Programs NO-1.a, NO-1.b, NO-1.d, and NO-1.f included in the CWP would implement maximum noise levels for residential uses in the Development Code, making this a less-than-significant impact.

Development consistent with the 2015 CAP Update measures could include energy efficiency retrofits or renewable energy additions to existing structures, waste recycling or reuse collection or management facilities, and infill and transit-oriented development that could result in operation noise above existing levels.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to substantially increase noise levels would have the same effect as described in the CWP FEIR. Adherence to the existing policies and programs (Policies NO-1.1 and NO-1.2, Program NO-1.a, NO-1.b, NO-1.c, NO-1.d, and NO-1.f) contained in the CWP would minimize the impacts from the 2015 CAP Update related to noise levels. Thus, with the 2015 CAP Update, the CWP's impact on ambient noise levels would remain less than significant.

**d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

As described in the CWP FEIR under Impact 4.4-5, construction of new development consistent with the CWP would temporarily raise noise levels near noise sensitive land uses. Policy NO-1.3 requires developers to minimize construction noise exposure to neighboring properties and open space, and Mitigation Measure 4.4-5 establishes allowable hours of operation and requires a construction noise reduction plan and disturbance coordinator. Even with mitigation, construction noise allowed under the CWP could continue to exceed maximum levels at sensitive receivers, making construction noise a significant and unavoidable impact.

The 2015 CAP Update could similarly result in construction that would temporarily raise noise levels near noise sensitive land uses. Some measures may result in the construction of energy efficiency retrofits or renewable energy additions to existing structures, development of waste recycling or reuse collection or management facilities, and infill and transit-oriented development. As discussed in the CWP FEIR, construction consistent with the 2015 CAP Update measures could cause significant impacts on adjacent noise sensitive land uses.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to temporarily increase noise levels would have the same effect as described in the CWP FEIR. Even with adherence to Policy NO-1.3 and Mitigation Measure 4.4-5 contained in the CWP, the impact would remain significant and unavoidable, although without new significant impacts or a substantial increase in the severity of impacts considered in the CWP FEIR. Thus, with the 2015 CAP Update, the CWP's impact on temporary noise levels would remain significant and unavoidable with mitigation.

**e. Be located within an airport land use plan area, or, where such a plan has not been adopted, within two miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?**

and

**f. Be located in the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels?**

As described in the CWP FEIR under Impact 4.4-2, because the CWP does not propose any changes to the location or level of activity or surrounding land uses, noise sensitive land uses would not be exposed to increased noise levels from airports or heliports, making the impact less than significant with adherence to Program NO-1.f, which requires that development proposals within the referral area of Gness Field be reviewed for consistency with noise criteria in the Airport Land Use Plan and the CWP.

Consistent with the CWP FEIR, the 2015 CAP Update measures do not propose any changes to the location or level of activity of surrounding land uses, including those adjacent to airports and heliports.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to locate development in the vicinity of a private airstrip would have the same effect as described in the CWP FEIR. With adherence to Program NO1.f, with the 2015 CAP Update, the CWP's impact would remain less than significant, and the 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of impacts considered in the CWP FEIR.

## **CWP FEIR Mitigation Measures**

**Mitigation Measure 4.4-5**, as included in the certified CWP FEIR, requires the County to adopt and implement the revised Program NO-1.i to regulate noise sources and allowable hours for construction-related activities. Refer to the CWP FEIR for the full text of Mitigation Measure 4.4-5.

## Conclusion

Development consistent with the 2015 CAP Update measures could include construction of energy efficiency retrofits or renewable energy additions to existing structures, waste recycling or reuse collection or management facilities, and infill and transit-oriented development that could result in operation or construction-period noise impacts. Construction-related noise impacts would temporarily raise noise levels near noise sensitive land uses and would remain significant. However, as discussed in the CWP FEIR, this impact would be less than significant with the adherence to policies and programs in place for mitigating permanent noise impacts, along with Mitigation Measure 4.4-5. Additionally, the 2015 CAP Update measures do not propose any changes to the location or level of activity or surrounding land uses, reducing the noise impacts of airports and heliports to a less-than-significant level. Therefore, the 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of impacts regarding noise that were analyzed in the CWP FEIR.

## 13. Population and Housing

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?
<b>Would the Project:</b> a. Induce substantial population growth in an area, either directly or indirectly?	Impact 4.1-2, page 4.1-47	No	No	No	Yes, Mitigation Measure 4.1-2
b. Displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?	Initial Study Section VI.2.c, page 10	No	No	No	N/A
c. Displace a substantial number of people, necessitating the construction of replacement housing elsewhere?	Initial Study Section VI.2.c, page 10	No	No	No	N/A

## Discussion

### **a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?**

As described in the CWP FEIR under Impact 4.1-2, although the CWP does not directly propose development projects, measures in the CWP would induce substantial population growth within the unincorporated portion of the County. Goals, policies, and programs in the CWP (Goals CD-1, CD-5, and CD-6, Policies CD-1.1 through CD-1.3, CD-2.2, CD-2.3, CD-2.8, CD-5.1, and CD-5.2, and Programs

CD-1.1 through CD-1.c, CD-1.e, CD-1.g, CD-2.d, CD-2.e, and CD-5.d) manage growth by requiring adequate public services in locations for new development, promoting a more compact land use pattern, and reducing impacts in sensitive habitats and hazard areas. Even with Mitigation Measure 4.1-2, which implements requirements for adequate infrastructure and growth monitoring, impacts from population growth would be significant and unavoidable.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The 2015 CAP Update, by its very nature, is not growth-inducing. The 2015 CAP Update provides a framework for reducing GHG emissions from existing and future development. The 2015 CAP Update measures promote the internal relationship of mutually supportive uses in transit-oriented areas so as to decrease dependency on the automobile, encourage alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, and promote sustainability. Adherence to the policies and programs contained in the CWP and Mitigation Measure 4.1-2, would minimize the impact and would ensure the 2015 CAP Update would not result in new significant impacts or a substantial increase in the severity of impacts considered in the CWP FEIR. Thus, with the 2015 CAP Update, the CWP's impact related to induced population growth would remain significant and unavoidable with mitigation.

**b. Displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?**

and

**c. Displace a substantial number of people, necessitating the construction of replacement housing elsewhere?**

As described in the Marin Countywide Plan Update 2005 Revised Initial Study, policies contained within the CWP would allow for the redevelopment of presently developed sites, potentially resulting in displacement of some residents. This displacement impact would be minor, and with the recent adoption of the Housing Element, which includes policies and programs to increase the supply of affordable housing, the CWP would have a beneficial effect on displacement. Thus, with the 2015 CAP Update, the CWP's impact related to displacement would remain less than significant.

## **CWP FEIR Mitigation Measures**

**Mitigation Measure 4.1-2**, as included in the certified CWP FEIR, requires the County to adopt and implement new policies and programs to provide adequate infrastructure capacity, correlate development and infrastructure, monitor growth and circulation, review and correlate countywide growth and infrastructure, and establish development review. Refer to the CWP FEIR for the full text of Mitigation Measure 4.1-2.

## **Conclusion**

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding population and housing that were analyzed in the CWP FEIR.

## 14. Public Services

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?
<p><b>Would the Project:</b></p> <p>a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:</p>					
i. Fire protection?	Impact 4.10-9, page 4.10-53	No	No	No	N/A
ii. Police protection?	Impact 4.10-11, page 4.10-60	No	No	No	N/A
iii. Schools?	Impact 4.10-12, page 4.10-63	No	No	No	N/A
iv. Parks?	Impact 4.10-13, page 4.10-67	No	No	No	N/A
v. Other public facilities?	N/A	No	No	No	N/A

### Discussion

**a. Result in substantial adverse impacts on any of the following public services:**

**i. Fire protection**

and

**ii. Police Protection**

As described in the CWP FEIR under Impacts 4.10-9 and 4.10-11, implementation of the CWP could increase demand for fire and police protection, resulting in the need for new or improved facilities

with potential subsequent impacts on the environment. The CWP includes goals and policies to promote fire and community safety and reduce the demand for fire and police protection. These goals and policies would reduce the impact to a less-than-significant level.

Implementation of the 2015 CAP Update could include modification of existing County structures and facilities, improvements to intersection operations, an increase in use of mass transit options, and implementation of other similar energy-saving actions. These measures would not generate new or increased demand for fire and police protection services, or interfere with or modify the ability of fire and police protection services to meet performance objectives or response times. As a result, implementation of the 2015 CAP Update would not change or alter the fire and police protection requirements and no impact would result.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to adversely affect fire and police protection services would have the same effect as described in the CWP FEIR.

Adherence to the policies and programs (Goals EH-4, PS-1 through PS-3, Policies AIR-1.3, BIO-4.1, BIO-4.2, CD-5.2, EH-4.1, EH-4.3, EH-4.4, NO-1-3, PS-1.1, PS-1., PS-2.1, PS-2.2, PS-3.1, and WR-2.1 through WR-24, and Programs PS-1.a through PS-1.e, PS-3.a through PS-3.j) contained in the CWP would minimize the impact related to fire and police protection services. Thus, with the 2015 CAP Update, the CWP's impact on fire protection services would remain less than significant.

### **iii. Schools**

As described in the CWP FEIR under Impact 4.10-12, demand for school services beyond the existing capacity would be generated as a result of the CWP measures, and would result in the need for additional facilities that could impact the environment. However, the CWP includes policies and programs that require County coordination with the school districts to reduce the potential impact on the biological resources, water resources, air quality, and noise, and reserve sites for future school needs, and to enhance preschool, school, after-school, and adult education programs. Because of these measures, the impact was considered less than significant.

The 2015 CAP Update does not include any measures that would increase school enrollment. Implementation of the 2015 CAP Update could modify school facilities to make them more energy efficient, but these retrofit projects would not change the capacity of schools or increase the enrollment. Implementation of 2015 CAP Update would not change or alter the school enrollment demands. Therefore, implementation of the 2015 CAP Update would not result in the need for new or expanded school facilities that could result in environmental effects, and no impact would result.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to adversely affect schools would have the same effect as described in the CWP FEIR. Adherence to the policies and programs (Policies EDU-1.1, EDU-2.1, EDU-2.2, EH-4.1, -4.3, -4.4, BIO-4.1, -4.2, WR-2.1 through -2.4, AIR-1.3, and NO-1-3, and Program EDU-1.c) contained in the CWP would minimize the impact related to schools. Thus, with the 2015 CAP Update, the CWP's impact on schools would remain less than significant.

### **iv. Parks**

See the discussion under Section 15, *Recreation*.

**v. Other Public Facilities**

Implementation of the 2015 CAP Update would not increase the demand for libraries or other services to the extent that new facilities would be required, and would not result in an accelerated deterioration of facilities or need for new facilities. Implementation of 2015 CAP Update measures could result in public facilities modifications to make them more energy efficient, but these retrofit actions would not interfere with operation of public facilities or increase the use or deterioration of the facility. Implementation of the 2015 CAP Update would not change or alter the demand for public facilities. For these reasons, implementation of the 2015 CAP Update would not result in the need for new or altered maintenance of public facilities, including roads, which could result in environmental effects, and no impact would result.

**CWP FEIR Mitigation Measures**

There are no applicable mitigation measures.

**Conclusion**

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding public facilities that were analyzed in the CWP FEIR.

**15. Recreation**

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?
<b>Would the Project:</b> a. 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?	Impact 4.10-13, page 4.10-67	No	No	No	N/A
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	Impact 4.10-13, page 4.10-67	No	No	No	N/A

## Discussion

**a. 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?**

**and**

**b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

As described in the CWP FEIR under Impact 4.10-13, the CWP would require new or expanded Community and Neighborhood Parks which could result in adverse effects on the environment. Policies in the CWP require park facilities development to complement the current national parks and open space, and to meet the desires of the community and protect natural resources. With these measures, the impact was considered to be less than significant.

Implementation of the 2015 CAP Update would not change or alter the demand for park or recreation facilities. For this reason, adoption and implementation of the 2015 CAP Update would not result in the need for new or expanded park facilities that could result in environmental effects, and no impact would result.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. Therefore, the potential for the 2015 CAP Update measures to adversely affect recreation would have the same effect as described in the CWP FEIR. Adherence to the policies (Policies AIR-1.3, BIO-4.1, BIO-4.2, CD-5.1, NO-1.3, PK-1.1, PK-1.2, TR-2.1, TR-2.2, TR-2.4, and WR-2.1 through WR-2.4, and Programs TR-2.a through TR-2.n) contained in the CWP would minimize the impact related to recreational facilities. Thus, with the 2015 CAP Update, the CWP's impact on recreational facilities would remain less than significant.

## CWP FEIR Mitigation Measures

There are no applicable mitigation measures.

## Conclusion

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding parks and recreational facilities that were analyzed in the CWP FEIR.

## 16. Transportation and Traffic

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?
<p><b>Would the Project:</b>                      a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</p>	<p>Impact 4.2-1, page 4.2-42</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>N/A</p>

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?
b. Conflict with an applicable congestion management program, including, but not limited to, level-of-service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways?	Impacts 4.2-2, page 4.2-46, 4.2-3, page 4.2-47, 4.2-4, page 4.2-48, 4.2-5, page 4.2-49, 4.2-6, page 4.2-49, 4.2-7, page 4.2-50, 4.2-8, page 4.2-51, 4.2-9, page 4.2-52, 4.2-10, page 4.2-52, 4.2-11, page 4.2-53, 4.2-12, page 4.2-54, 4.2-13, page 4.2-55, 4.2-14, page 4.2-56, 4.2-15, page 4.2-56, 4.2-16, page 4.2-57, 4.2-17, page 4.2-57, 4.2-18, page 4.2-58, 4.2-19, page 4.2-59, 4.2-20, page 4.2-60, 4.2-21, page 4.2-62, 4.2-22, page 4.2-63, 4.2-23, page 4.2-64, 4.2-24, page 4.2-65, and 4.2-25, page 4.2-65	No	No	No	Yes, Mitigation Measures 4.2-1, 4.2-2, 4.2-3, 4.2-4, 4.2-5, 4.2-6, 4.2-7, 4.2-8, 4.2-9, 4.2-10, 4.2-11, 4.2-12, 4.2-13, 4.2-14, 4.2-15, 4.2-16, 4.2-17, 4.2-18, 4.2-19, 4.2-20(a through d), 4.2-21(a and b), 4.2-22(a and b), 4.2-23 (a and b), 4.2-24
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	N/A	No	No	No	N/A
d. Substantially increase hazards because of a design feature or incompatible uses?	N/A	No	No	No	N/A

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?
e. Result in inadequate emergency access?	Initial Study Section VI.6.c, page 15	No	No	No	N/A
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Impacts 4.2-26, page 4.2-66, and 4.2-27, page 4.2-67	No	No	No	N/A

## Discussion

**a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

As described in the CWP FEIR under Impact 4.2-1, land uses and development consistent with the CWP would result in a significant increase in VMT. Even with policies and programs in the CWP and Mitigation Measure 4.2-1, which would reduce VMT, this impact was considered significant and unavoidable.

The 2015 CAP Update measures include policies aimed to reduce VMT. The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The 2015 CAP Update measures would reduce VMT and improve the effectiveness of the circulation system, resulting in a beneficial impact. Thus, the 2015 CAP Update measures would not result in new significant impacts or substantially increase the severity of the impacts relating to traffic and transportation that were analyzed in the CWP FEIR.

**b. Conflict with an applicable congestion management program, including, but not limited to, level-of-service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways?**

The CWP FEIR identified 22 intersections and roadway segments that would have significant and unavoidable impacts after implementation of the CWP (refer to Impacts 4.2-2 through 4.2-24). Even with Mitigation Measures 4.2-2 through 4.2-24 these impacts were considered significant and unavoidable or cumulatively significant. The analysis under CWP Impact 4.2-25 concluded that the roadway segment in Marin City would have a less-than-significant impact without mitigation.

The 2015 CAP Update measures include policies aimed to reduce VMT, which would improve traffic conditions relative to those disclosed in the 2007 EIR.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The 2015 CAP Update measures would reduce VMT and improve the effectiveness of these intersections, resulting in a beneficial impact. The 2015 CAP Update measures would not result in new significant impacts or substantially increase the severity of the impacts related to traffic and transportation that were analyzed in the CWP FEIR.

**c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

The 2015 CAP Update does not include any measures that would result in a change in air traffic patterns. Therefore, there would be no impact and this topic is not analyzed further.

**d. Substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The 2015 CAP Update includes measures that would support additional transit, bicycle, or pedestrian facilities but does not include any actions that would increase hazards because of a design feature or incompatible use. Therefore, there would be no impact and this topic is not analyzed further.

**e. Result in inadequate emergency access?**

As described in the Marin Countywide Plan Update 2005 Revised Initial Study, policies contained within the CWP would not directly affect countywide emergency access or procedures. Inadequate emergency access may result from specific project proposals. Such impacts would be site-specific and, thus, are unknown at this time and will be addressed at the time the projects are proposed. Therefore, adoption of the CWP would not lead to foreseeable impacts on emergency access. With the 2015 CAP Update, CWP impacts on emergency access would remain less than significant.

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

The analysis in the CWP FEIR under Impacts 4.2-26 and 4.2-27 found that the CWP would result in increased urban land uses and subsequent demand for transit services and bicycle and pedestrian facilities. Simultaneously increased automobile traffic could increase conflicts between bicyclists, pedestrians, and transit riders and automobiles. Goals and policies (Goals TR-1 and TR-2 and Policies TR-1.1, TR-1.2, TR-1.6, and TR-2.1 through TR-2.4) in the CWP would improve bicycle and pedestrian facilities and transit services to accommodate the increased demand and improve safety, making this impact less than significant.

The 2015 CAP Update measures would result in construction of additional transit, bicycle, and pedestrian facilities and expanded transit service to complement the promotion of infill and transit-oriented development. However, it is possible that the additional development would increase demand on transit services beyond the added capacity.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to conflict with safety or plans related public transit, bicycle, or pedestrian facilities would have the same effect as described in the CWP FEIR. Adherence to the goals and policies contained in the CWP would

minimize impacts from the 2015 CAP Update related to public transit, bicycle, and pedestrian facilities, and would ensure the 2015 CAP Update measures would not result in new significant impacts or substantially increase the severity of the impacts related to traffic and transportation that were analyzed in the CWP FEIR. Thus, with the 2015 CAP Update, the CWP's impact on public transit, bicycle, and pedestrian facilities would remain less than significant.

## **CWP FEIR Mitigation Measures**

**Mitigation Measure 4.2-1**, as included in the certified CWP FEIR, requires the County to adopt and implement a new policy and program to reduce the rate of increase for total vehicle miles traveled per person by single-occupant automobile. Further, the County will develop and implement a program for monitoring VMT and identify and require in new developments specific strategies for reducing the rate of increase for VMT. Refer to the CWP FEIR for the full text of Mitigation Measure 4.2-1.

**Mitigation Measure 4.2-2**, as included in the certified CWP FEIR, relies on Goal TR-3 of the CWP, which seeks to provide efficient, affordable public transportation service countywide, and its supporting policies and programs would help reduce congestion on the Golden Gate Bridge by attracting more commuters to public transit services by increasing bus and ferry services, improving bus facilities, providing reduced cost transit passes, participating in regional transit initiatives, and promoting transit-oriented development. Refer to the CWP FEIR for the full text of Mitigation Measure 4.2-2.

**Mitigation Measures 4.2-3 through 4.2-24**, as included in the certified CWP FEIR, requires the County to improve specific County highways/roadways and intersections through widening, adding turn lanes, adding through lanes, and signaling intersections to improve conditions to acceptable LOS. Highways/roadways identified for improvement include SR 1, SR 131, Sir Francis Drake Boulevard, East Sir Francis Drake Boulevard, Interstate 580, U.S. Highway 101, South Novato Boulevard, Lucas Valley Road, Tiburon Boulevard, Grand Avenue, and Third Street. Intersections identified for improvement include Miller Creek Road/Las Gallinas Avenue, Miller Creek Road/U.S. Highway 101 southbound off-ramp, and Miller Creek Road/U.S. Highway 101 northbound off-ramp. Refer to the CWP FEIR for the full text of Mitigation Measures 4.2-3 through 4.2-24.

## **Conclusion**

New development consistent with the CWP could increase VMT and worsen LOS, and contribute to a significant and unavoidable traffic impact at some locations. However, the 2015 CAP Update includes measures to reduce VMT, expand transit services and improve bicycle, pedestrian, and transit facilities, which will help to reduce traffic impacts overall. The 2015 CAP Update measures would thus not result in new significant impacts or a substantial increase in the severity of the impacts regarding transportation and traffic that were analyzed in the CWP FEIR.

## 17. Utilities and Service Systems

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?
<b>Would the Project:</b> a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Impact 4.10-5, page 4.10-28	No	No	No	N/A
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Impact 4.10-5, page 4.10-28	No	No	No	N/A
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Impacts 4.5-5, page 4.5-41 and, 4.5-6, page 4.5-44	No	No	No	Yes, Mitigation Measures 4.5-6 and 4.5-5
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed?	Impacts 4.9-1, page 4.9-74, 4.9-2, page 4.9-89, and 4.9-3, page 4.9-114	No	No	No	Yes, Mitigation Measures 4.9-1(a through c), 4.9-2
e. Result in a determination by the wastewater treatment provider that 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?	Impact 4.10-4, page 4.10-20	No	No	No	Yes, Mitigation Measure 4.10-4
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Impact 4.10-6, page 4.10-34	No	No	No	N/A

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?
g. Comply with federal, state, and local statutes and regulations related to solid waste?	Impact 4.10-6, page 4.10-34	No	No	No	N/A

## Discussion

**a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

and

**b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

As described in the CWP FEIR under Impact 4.10-5, new or improved wastewater treatment facilities may be needed due to development and land uses consistent with the CWP. Policies and programs in the CWP would reduce the demand for wastewater treatment and ensure that adequate facilities are planned for and constructed. Additionally, policies in the CWP would reduce construction related impacts from new or expanded wastewater facilities on biological resources, water resources, air quality, and noise.

There are several 2015 CAP Update measures that uses that would require water supply. For example, land use measures could promote infill and transit-oriented development within the city centers, which could increase the demand for water supply, potentially requiring the construction of new or expansion of existing water or wastewater treatment facilities. However, the 2015 CAP Update includes measures for water conservation and reuse, such as renovating existing buildings to have high levels of water efficiency, installing water monitoring and management systems for the County’s irrigation needs, and integrating water district conservation efforts, resulting in lower water demand and wastewater generation and potentially a beneficial impact.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to result in construction of new or expanded water or wastewater treatment facilities would have the same effect as described in the CWP FEIR. Adherence to the policies (Policies BIO-4.1, BIO-4.2, WR-2.1, through WR-2.4, AIR-1.3, and NO-1.3) contained in the CWP would minimize the impact of 2015 CAP Update measures related to wastewater treatment facilities construction. Thus, with the 2015 CAP Update, the CWP’s impact on wastewater treatment facilities would remain less than significant.

**c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

As described in the CWP FEIR under Impacts 4.5-5 and 4.5-6, implementation of CWP measures could increase peak flow rates, erosion, and downstream sedimentation and require expansion of existing stormwater drainage systems. There is a potential for the construction of these facilities to result in secondary impacts on hydrology and water quality. Policies and programs contained in the CWP (Policies BIO-4.1, BIO-4.2, BIO-4.4, BIO-4.7 through BIO-4.9, BIO-4.14, CD-1.3, CD-5.1, CD-5.2, EH-3.2, PFS-1.4, SV-1.4, SV-1.9, SV-1.10, WR-1.1, WR-1.3, WR-1.4, WR-2.1, WR-2.3, and Programs BIO-4.f through BIO-4.k, CD-1.c, CD-5.g, DES-3.b, DES-4.e, EH-3.f, and TR-4.a) and implementation of mitigation Measure 4.5-5 from the CWP FEIR would minimize these impacts. Implementation of the 2015 CAP Update would result in alterations to existing buildings and infrastructure, in the form of building retrofits as well as improvements to the transportation and utility systems; however, such changes are not expected to substantially increase impervious surfaces to the extent that it would require the construction of new storm water infrastructure. Such improvements would be subject to existing policies and programs related to storm water, including the Municipal Storm Water NPDES Permit. Because the 2015 CAP Update would reduce, rather than increase, storm water runoff, it is not anticipated that it would cause new or more severe impacts related to storm water.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to require expansion of existing stormwater drainage facilities would have the same effect as described in the CWP FEIR. Adherence to policies and programs contained in the CWP, and Mitigation Measure 4.5-6 would minimize the impact of the 2015 CAP Update measures related stormwater drainage facilities. Thus, with the 2015 CAP Update, the CWP's impact would remain less than significant with mitigation.

**d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed?**

As described in the CWP FEIR under Impact 4.9-1, land uses and development consistent with the CWP would increase demand for water and result in insufficient water supplies to serve some areas in normal rainfall years. Goals, policies, and programs in the CWP promote reducing water demand and finding sustainable sources of water for humans. Even with adherence to these policies, the impact is significant and requires mitigation. Mitigation Measure 4.9-1 (a through c) amends Programs in the CWP to include requirements for sustainable sourcing of water and measures to reduce water demand. However, even with these mitigation measures, the impact would remain significant and unavoidable.

As described in the CWP FEIR under Impact 4.9-2, land uses and development consistent with the CWP would increase demand for water and result in insufficient water supplies to serve some areas during drought and multi-drought years. Mitigation Measure 4.9-2 would be the same as Mitigation Measures 4.9-1(a) through (c) above, and similarly would not sufficiently reduce the impact, resulting in a significant and unavoidable impact.

As described in the CWP FEIR under Impact 4.9-3, land uses and development consistent with the CWP would increase demand for water that could exceed the capacity of available distribution, treatment, and/or storage facilities for some water agencies during short, peak demand periods. Although construction of expanded or retrofitted water supply facilities could result in adverse effects to the environment, the CWP contains policies (Goal PFS-2, Policies AIR01.3, BIO-4.1, BIO-4.2,

NO-1.3, PFS-2.1, PFS-2.2, WR-1.1 through WR-1.4, WR-2.1 through WR-2.4, WR-3.1, Programs AF-1.q, PFS-2.a through PFS-2.d, PFS-2.f through PFS-2.k, PFS-2.m through PFS-2.q) that would reduce the impacts to a less-than-significant level.

There are several 2015 CAP Update measures that would require water supply. For example, land use measures could promote infill and transit-oriented development within the city centers, which could increase the demand for water supply. However, the 2015 CAP Update includes measures for water conservation and reuse, such as renovating existing buildings to have high levels of water efficiency, installing water monitoring and management systems for the County's irrigation needs, and integrating water district conservation efforts, resulting in lower water demand and potentially a beneficial impact.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to require new or expanded entitlements for water supplies during normal rainfall and drought years would have the same effect as described in the CWP FEIR. Adherence to the goals, policies, and programs (Goal PFS-2, WR-1 through WR-3, Policies PFS-2.1 through WR-2.3, WR-1.1 through WR-1.4, WR-2.1 through WR-2.5, WR-3.1 and WR-3.2, and Programs PFS-2.a through PFS-2.k and WR-2.m through WR-2.q, WR-2.k, WR-3.a and WR-3.b) contained in the CWP and implementation of Mitigation Measures 4.9-1 (a through c) and Mitigation Measures 4.9-2 would minimize the impact of 2015 CAP Update measures on water supply. Thus, with the 2015 CAP Update, the CWP's impact on water supplies would remain less than significant with mitigation.

**e. Result in a determination by the wastewater treatment provider that 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?**

As described in the CWP FEIR under Impact 4.10-4, the CWP would result in development in unincorporated areas that would increase wastewater treatment demand, and generate wastewater flows that exceed the capacity of the Bolinas Community Public Utilities District. The CWP includes goals and policies to reduce wastewater generation with water conservation and alternative wastewater systems, and require coordination between the County and cities and towns to ensure development activities are consistent with wastewater service capacity. Mitigation Measure 4.10-4 requires the County to continue cooperation with the Bolinas Community Public Utilities District to maintain the existing moratorium on new development until the district is able to accommodate more wastewater capacity. Although this measure would reduce this impact to a less-than-significant level, the cumulative impact would remain significant and unavoidable.

The 2015 CAP Update includes a measure to reduce water use, which in turn reduces wastewater generation, resulting in less wastewater requiring treatment.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to result in inadequate wastewater treatment capacity would have the same effect as described in the CWP FEIR. Adherence to the goals, policies, and programs (Goal PFS-1, Policies PFS-1.1, PFS-1.4, PFS-2.1, PFS-2.2, WR-3.1, WR-3.2, and Programs CD-5.d, CD-5.e, PFS-1.a, PFS-1.b, PFS-1.d, PFS-2.a, PFS-2.b, and PFS-3.a) contained in the CWP and Mitigation Measure 4.10-4 would minimize the impact of the 2015 CAP Update related to wastewater treatment providers. Thus, with the 2015 CAP Update, the CWP's impact on wastewater treatment would remain less than significant with mitigation at a project level and would remain a significant and unavoidable cumulative impact.

**f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

and

**g. Comply with federal, state, and local statutes and regulations related to solid waste?**

As described in CWP FEIR under Impact 4.10-6, the increase in waste generated by the CWP would not affect the County's ability to provide appropriate disposal capacity, or increase solid waste generation beyond the capacity of the Redwood Landfill. Additionally, the CWP would be consistent with the Regional Integrated Waste Management Plan Countywide Siting Element (CSE). Goals and policies in the CWP would reduce solid waste generation and subsequent adverse environmental effects. This impact would be less than significant.

Measures in the 2015 CAP Update would result in alterations to existing landfills to increase the methane capture rate. Improvements to existing gas-capture equipment would not require the expansion to existing landfills and would not modify the remaining capacity of existing landfills. However, such improvements could result in construction activities within the existing footprint of affected landfill facilities that could generate construction waste. One measure established a zero waste disposal (93 percent diversion) by 2025. Such measures include a change to the weekly collection of organics and recycling, biweekly refuse collection, and wet/dry collection for single- and multi-family residences, and behavior change market and wet/dry collection for commercial customers. To achieve 90 percent waste diversion, existing recycling and transfer facilities may need to be expanded, and new waste handling facilities may need to be constructed. However, expansion plans for the Redwood Landfill were approved in 2008. The expansion increased the capacity of the landfill to 26.1 million cubic yards and increased receipts of recyclable materials. Therefore, it is not anticipated that any additional expansions or new facilities would be required.

Any solid waste generated during construction-related activities associated with implementation of the 2015 CAP Update would be recycled or disposed of in accordance with all applicable local, state, and federal regulations. Demolition or construction materials that can be recycled or reused would comply with the County's CSE. Any new facilities or expansions to existing facilities would be subject to existing County policies and regulations and General Plan policies and programs applicable to solid waste facilities.

The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to result in insufficient landfill capacity for the project's solid waste disposal needs would have the same effect as described in the CWP FEIR. Adherence to the goals, policies, and programs (Goal PFS-4, Policies PFS-4.1 through PFS-4.3, MIN-1.1, and CD-5.2, and Programs EN-3.c and DES-1.d, AIR-4.c, PFS-4.c, and PFS-4.d) contained in the CWP would minimize the impact of the 2015 CAP Update related to solid waste disposal. Thus, with the 2015 CAP Update, the CWP's impact on capacity for solid waste disposal would remain less than significant.

## **CWP FEIR Mitigation Measures**

**Mitigation Measure 4.5-5**, as included in the certified CWP FEIR, requires that Mitigation Measures 4.5-1(b), 4.5-3(b), and 4.5-4(b) be implemented, reducing the potential impact of flooding from undersized stormwater drainage systems capacity. Refer to the CWP FEIR for the full text of Mitigation Measure 4.5-5.

**Mitigation Measure 4.5-6**, as included in the certified CWP FEIR, requires that Mitigation Measures 4.5-1(b), 4.5-3(b), 4.5-4(b) be implemented, reducing the potential environmental impacts of expanding stormwater drainage facilities. Refer to the CWP FEIR for the full text of Mitigation Measure 4.5-6.

**Mitigation Measure 4.9-1 (a through c)**, as included in the certified CWP FEIR, requires the County to revise Programs PFS-2.c (Promote Ahwahnee Principles for Water Supply), PFS-2.d (Support Water Demand Planning), PFS-2.g (Promote Xeriscaping, Site Appropriate Landscaping and Native Plants), PFS-2.h (Promote Site Appropriate, Low-water Use and Drought Tolerant Native Plants in Public Facilities), PFS-2.j (Upgrade West Marin Systems), PFS-2.m (Promote Onsite Rainwater Capture and Retention), PFS-2.o (Assess Project Impacts to Surface Water and Groundwater), PFS-2.p (Investigate and Consider Appropriate Small-Scale Wastewater Reduction, Treatment, and Use Technologies), PFS-2.q (Adopt Tiered Billing Rates), WR-2.k (Establish Educational Partnerships to Protect Water Quality), and WR-3.b (Support and Integrate Water District Conservation Efforts). In addition, the County will adopt and implement new policies aimed at requiring sustainable water supply and offsetting new water demand. Lastly, the County is required to obtain funding for Programs PFS-2.e, PFS-2.k, PFS-2.n, PFS-2.p, WR-2.k, WR-3.a, and WR-3.b, set the priority of PFS-2.k, WR-2.k, and to “medium” or higher, and revise the time frame of implementation of PFS-2.f, PFS-2.n, PFS-2.o, and WR-2.k to the medium-term or sooner. Refer to the CWP FEIR for the full text of Mitigation Measure 4.9-1 (a through c).

**Mitigation Measure 4.9-2**, as included in the certified CWP FEIR, requires the County to implement Mitigation Measure 4.9-1(a), 4.9-1(b) and 4.9-1(c). Refer to the CWP FEIR for the full text of Mitigation Measure 4.9-2.

**Mitigation Measure 4.10-4**, as included in the certified CWP FEIR, requires the County to continue cooperating with the Bolinas Community Public Utilities District to maintain the existing moratorium on new development and deny discretionary projects until such time the district is able to construct new or expanded facilities with sufficient capacity to accommodate such growth. Refer to the CWP FEIR for the full text of Mitigation Measure 4.10-4.

## Conclusion

The 2015 CAP Update includes measures to reduce and avoid GHG emissions associated with water, wastewater, and waste services. These measures include policies for waste reduction, reuse, and recycling and water conservation and wastewater treatment. Subsequently, these measures would result in a beneficial impact due to more efficient public utility conveyance and lower water demand. The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts regarding utilities and service systems that were analyzed in the CWP FEIR.

### 18. Mandatory Findings of Significance

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?
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	Impacts 4.6-1, page 4.6-30, 4.6-2, page 4.6-35, 4.6-3, page 4.6-40, 4.6-4, page 4.6-42, 4.6-5, page 4.6-46, 4.6-6, page 4.6-47, 4.11-1, page 4.11-10, and 4.11-2 page 4.11-12	No	No	No	Yes, Mitigation Measures 4.6-1, 4.6-2, 4.6-4 (a and b), and 4.11-1
b. Does the project have impacts that are individually limited but cumulatively considerable?	Section 2.4, page 2.0-46	No	No	No	Yes, all Mitigation Measures in the CWP FEIR
c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	Section 2.4, page 2.0-46	No	No	No	Yes, all Mitigation Measures in the CWP FEIR

### Discussion

**a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

As discussed in Section 4, *Biological Resources*, and Section 5, *Cultural Resources*, the CWP FEIR concluded that land uses and development consistent with the CWP would result in less-than-significant impacts on biological resources (special-status species, sensitive natural communities, wetlands and other waters, local policies or ordinances, and adopted habitat conservation plans or

natural community conservation plans) and cultural resources (historic resources, archeological resources, paleontological resources, and human remain) through compliance with existing policies and programs in the CWP and implementation of impact-specific mitigation measures. However, implementation of the CWP would result in a significant and unavoidable impact on wildlife habitat and movement opportunities. Even with implementation of existing policies, programs, and mitigation measures, this impact cannot be fully mitigated and would remain significant and unavoidable. The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to degrade the quality of the biological and cultural environment would have the same effect as described in the CWP FEIR. The 2015 CAP Update would not result in significant changes to the previously identified impact.

**b. Does the project have impacts that are individually limited but cumulatively considerable?**

The CWP FEIR identified cumulative impacts associated with implementing the land uses and development envisioned in the CWP in the following resource topics: land use, population, and housing; transportation; air quality; noise; biological resources; geology; agriculture; water supply and demand; public services; and visual resources. The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to result in cumulative impacts would have the same effect as described in the CWP FEIR but would lower the level of cumulative effects associated with air quality and transportation. The 2015 CAP Update would not result in new significant or substantially more severe contributions to previously identified significant cumulative impacts.

**c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?**

Implementation of the land uses and development consistent with the CWP would result in significant impacts on the following resources areas that would also cause substantial direct or indirect adverse effects on human beings: air quality (increase in GHG emissions) and geology (risks related to seismic hazards, and tsunami and seiches). The measures in the 2015 CAP Update are effectively the implementation of the goals, policies, and programs provided in the CWP. The potential for the 2015 CAP Update measures to result in environmental effects that would cause adverse effects on human beings would have the same effect as described in the CWP FEIR. The 2015 CAP Update would not result in new significant or substantially more severe contributions to previously identified significant cumulative impacts.

## **CWP FEIR Mitigation Measures**

Applicable mitigation measures include all mitigation measures provided in the CWP FEIR.

## **Conclusion**

The 2015 CAP Update measures would not result in new significant impacts or a substantial increase in the severity of the impacts that were analyzed in the CWP FEIR.

## **Summary Findings of Checklist**

This environmental checklist review analyzes the proposed 2015 CAP Update and compares the potential impacts to the conclusions of the 2007 CWP FEIR. This analysis was completed to

determine the requirement for further environmental documentation pursuant to the State CEQA Guidelines sections 15162, 15163 and 15164. This analysis has identified no new or substantially more severe impacts of the proposed 2015 CAP Update compared to those identified and evaluated in the 2007 CWP FEIR. Mitigation measures identified in the 2007 CWP FEIR would be applied to the 2015 CAP Update, as proposed, to reduce or avoid significant impacts. With the application of these previously-identified mitigation measures, no new significant impacts or substantial increase in the severity of previously identified impacts requiring revisions to the 2007 CWP FEIR would occur. No new mitigation measures are required for the adoption and implementation of the proposed 2015 CAP Update.

### III. List of Preparers

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## IV. Sources Consulted

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