

TABLE OF CONTENTS

2000 LARKSPUR LANDING CIRCLE PROJECT EXPANDED INITIAL STUDY

PROJECT DESCRIPTION.....	1
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED... ..	15
EVALUATION OF ENVIRONMENTAL IMPACTS	16
I. Aesthetics.....	16
II. Agricultural Resources.....	30
III. Air Quality	30
IV. Biological Resources	35
V. Cultural Resources	41
VI. Geology and Soils.....	48
VII. Hazards and Hazardous Materials	53
VIII. Hydrology and Water Quality.....	58
IX. Land Use and Planning.....	66
X. Mineral Resources	70
XI. Noise	71
XII. Population and Housing.....	77
XIII. Public Services.....	80
XIV. Recreation	81
XV. Transportation.....	85
XVI. Utilities and Service Systems.....	97
XVII. Mandatory Findings of Significance.....	100
MITIGATION.....	102

FIGURES:

1.	Project Location.....	2
2.	Project Site Plan.....	4
3.	Conceptual Hotel Elevations.....	6
4.	Green Court Building and Row Townhouse Building - First Level Plans	8
5.	Auto Court Design 1 and 2 Buildings - First Level Plans	10
6.	Location of Views.....	19
7.	View From East Sir Francis Drake Boulevard.....	20
8.	View From Golden Gate Ferry Terminal.....	22
9.	View From Larkspur Landing Shopping Center.....	23
10.	View From Northeast Portion of the Site.....	26

CITY OF LARKSPUR EXPANDED INITIAL STUDY

Project Title: 2000 LARKSPUR LANDING CIRCLE

Lead Agency Name and Address: City of Larkspur
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Larkspur, CA 94939

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1348 Fourth Street, Suite 200
San Rafael, CA 94901
and
Ross Valley Sanitary District
(Sanitary District No. 1)
2000 Larkspur Landing Circle
Larkspur, CA 94939

Brief Description of the Proposed Action:

The proposed project includes a mixed-use development of 126 residential units, a business hotel, and replacement administration and maintenance facilities for the Ross Valley Sanitary District.

Other Public Agencies Whose Approval is Required: N/A

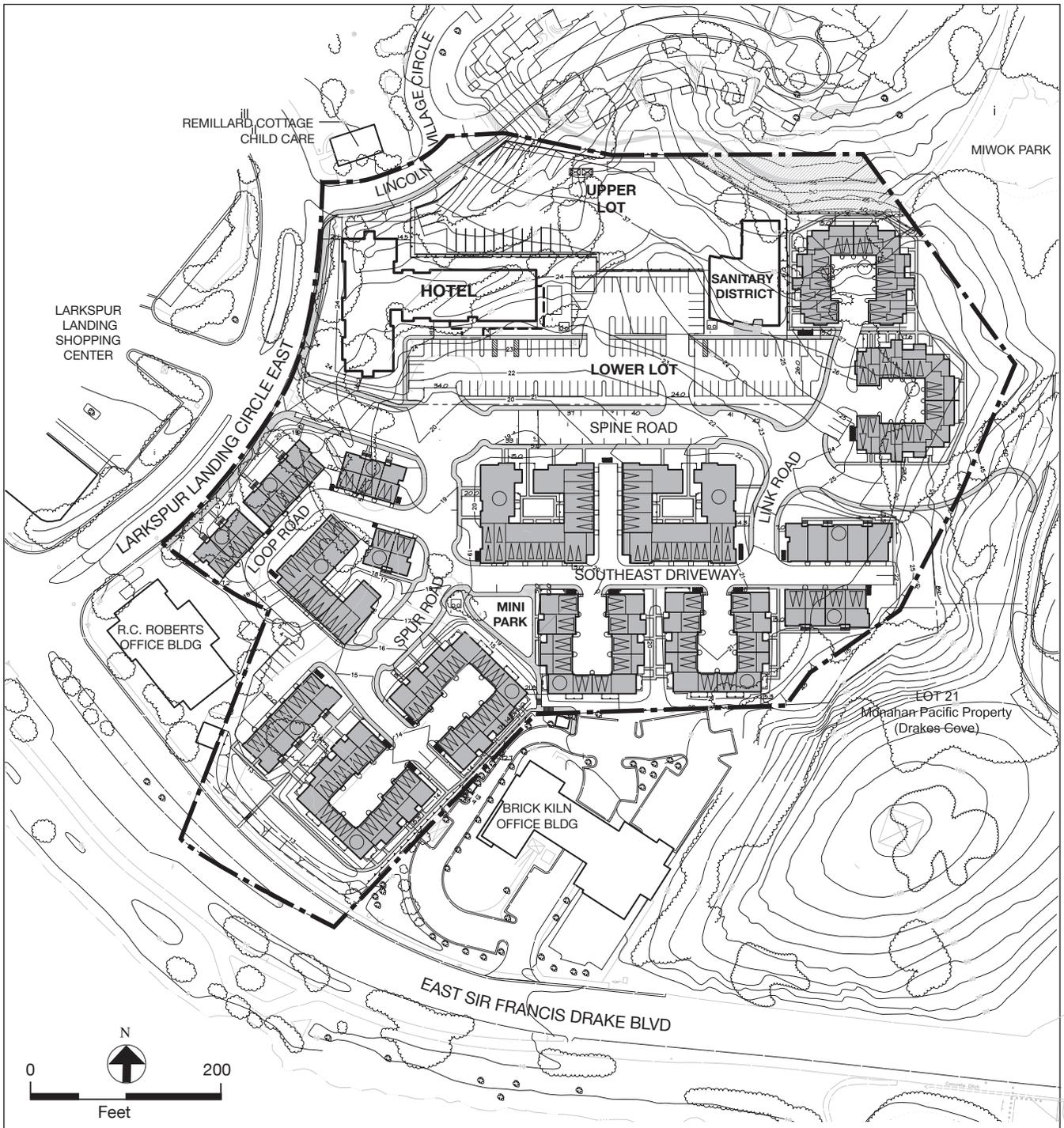
PROJECT DESCRIPTION

Introduction

The 2000 Larkspur Landing Circle project site is at the intersection of East Sir Francis Drake Boulevard and Larkspur Landing Circle East in the City of Larkspur. (See Figure 1: Project Location.) The project site on Assessor's Parcel No. 018-171-32 (Parcel # 32) covers about 10.675 acres and is irregular in shape. Of the gross project site area, 0.22 acres lie under the East Sir Francis Drake Boulevard right-of-way and 0.16 acres lie under the Lincoln Village Circle right-of-way, leaving a net project site area of approximately 10.295 acres.

The site is presently owned by the Ross Valley Sanitary District of Marin County (hereinafter Sanitary District No. 1), which is the regional sanitary service provider for the Ross Valley area; all but 1.5 acres is under option to Campus St. James, Larkspur, LLC. The proposed project would demolish the existing Sanitary District No. 1 facilities and construct a mixed-use development project, including a business hotel, replacement facilities for the Sanitary District, and about 126 for-sale residential units in 16 multi-family residential buildings. (See Figure 2: Project Site Plan.) The proposed hotel would be at the northwest corner of the site near the intersection of Larkspur Landing Circle East and Lincoln Village Circle. The replacement Sanitary District No. 1 facilities building would be located to the east of the hotel, with surface parking separating the two buildings. The remaining site area to the south and east would be occupied by 16 multiple-unit residential buildings, with several of these buildings planned around landscaped courtyards or parking courts and the rest designed as row townhouses, some of which would be live/work units. Access to project buildings and on-site parking would be mainly from Larkspur Landing Circle East. An internal east-west Spine Road would lead from Larkspur Landing Circle East through the middle of the property to the residential project currently being developed by Monahan Pacific to the east. Secondary roadways would connect to the proposed buildings and open space. Parking for the hotel and Sanitary District facilities would be provided in surface parking lots located between and in front of the two buildings. The Sanitary District would also have parking in an upper-level lot located immediately west of the Sanitary District building and north of the hotel site, accessed from Lincoln Village Circle. Residential buildings would have parking spaces assigned to individual residential units located in enclosed garages at the first level. Approximately 10,000 sq. ft. of site area near the northeast corner of the site is proposed to be dedicated for the expansion of Miwok Park; this area would be designated in the General Plan as “Open Space (Parkland),” similar to Miwok Park.

The proposed project would require a General Plan Amendment, Circulation Assessment Permit, Heritage Tree Removal Permit, a Grading Permit, and Design Review. The project site is zoned Planned Development (P-D); therefore, a Preliminary Development Plan and a Precise Development Plan are required as well as requested exceptions to the Zoning Ordinance. A Subdivision Map would be required to create separate parcels for the Sanitary District, hotel, and residential uses, and for residential condominiums.



SOURCE: Turnstone Consulting

LEGEND

 PROPOSED RESIDENTIAL BUILDINGS

Proposed Uses

The proposed project includes several different land uses and building types, which are described below.

Hotel. The proposed hotel use would occupy approximately 1.5 acres of the project site. The approximately 63,275 square-foot (sq. ft.) hotel would include about 80 rooms, and would most likely be an extended-stay business and leisure hotel. The four-story, approximately 57-foot-tall hotel building would be T-shaped in footprint; the western end of the hotel would front on Larkspur Landing Circle East, while the northernmost and southernmost ends of the hotel would front on Lincoln Village Circle and the internal Spine Road, respectively. (See Figure 3: Conceptual Hotel Elevations.) The length of the hotel would be oriented to provide views of ferry activity at the Golden Gate Ferry Terminal, Corte Madera Creek, and Mount Tamalpais. The hotel would be designed to address the long-term needs of business and leisure travelers. Most rooms or suites would have a living room area and a small kitchen. Limited on-site food service and a small meeting room would be provided for the use of hotel guests only; no public restaurant or meeting facility is proposed. An outdoor pool for the use of hotel guests would be provided at the eastern end of the hotel, with surface parking located further east. The northern and southern sides of the hotel would also be flanked by surface parking.

Replacement Sanitary District Facilities. The project proposes to remove the existing on-site Sanitary District No. 1 administration and maintenance structures and relocate them in a new building on an approximately 1.5-acre lot located on the northern portion of the site. The replacement Sanitary District facilities would be designed to accommodate current on-site Sanitary District activities. The 33-foot-tall, 11,000-sq.-ft. replacement building would include administrative offices, meeting rooms, employee training and locker space, equipment maintenance facilities, and enclosed storage. An open-air storage yard would provide parking for approximately 20 to 25 service vehicles; storage space for materials necessary for field repairs of District facilities; an above-ground, self-contained fuel vault for refueling service vehicles; and a maneuvering/loading area.

The replacement Sanitary District building would be developed internally as a split-level structure to follow the varying grades at the northern end of the site; therefore, it would appear to be a two-story building when viewed from the south and a one-story building when viewed from the north. The lower-level employee/visitor parking lot would be immediately south of the Sanitary District building and accessible from the internal east-west Spine Road and Larkspur Landing Circle East. The upper-level lot, with the storage yard and additional employee parking spaces, would be immediately west of the building and accessible from Lincoln Village Circle. The maintenance facilities within the Sanitary District building also would be accessed from Lincoln Village Circle through this upper-level lot.



WEST ELEVATION



SOUTH ELEVATION

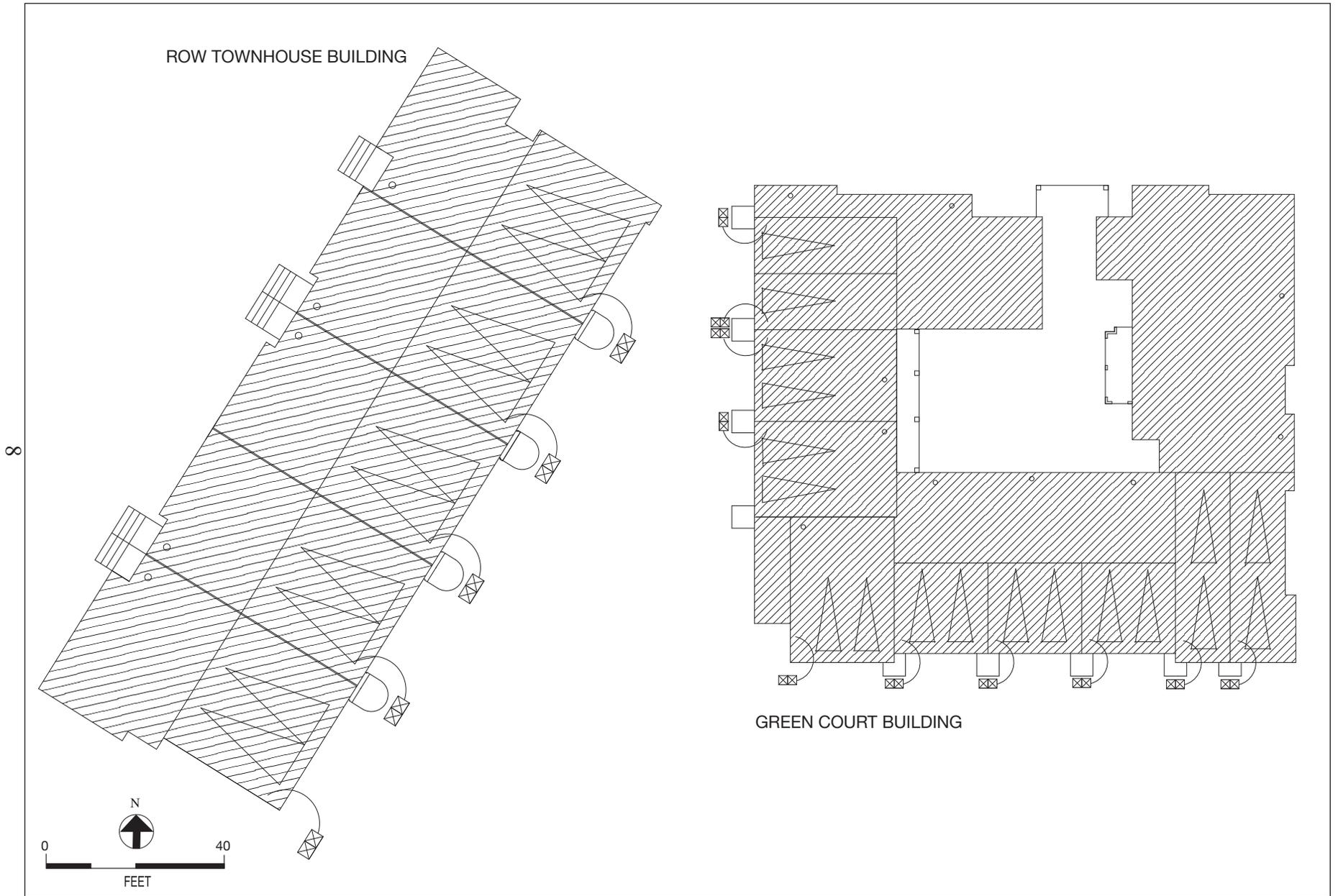


SOURCE: Land Development Solutions Inc.

Residential Uses. The project includes 126 for-sale residential units configured in 16 multiple-unit residential buildings, with a total of about 273,445 sq. ft. of residential space. The proposed residential uses would occupy approximately 7.675 acres of the project site; therefore, the project's residential density would be about 16 dwelling units per acre. The proposed residential buildings would include 19 one-bedroom, 70 two-bedroom, and 37 three-bedroom residential units. Four types of residential buildings with several different combinations of multi-family residential units are proposed to accommodate a variety of family sizes and income levels. The project would include 25 units (19.84 percent of the 126 units) affordable to individuals and families earning less than 120 percent of the areawide median income.

The following four types of residential buildings are proposed:

- (i) **Green Court Building:** Eight- or ten-unit, two- to three-story, 37- to 40-foot-tall attached townhouses and stacked flats would be arranged around a central landscaped courtyard. (See Figure 4: Green Court Building and Row Townhouse Building - First Level Plans.) Private pedestrian access and enclosed private and communal open spaces would be provided for residents. A pedestrian pathway to the landscaped courtyard would be provided on one side of each of these buildings. Vehicular access would be from the rear of the building, and enclosed parking garages would line two sides of the exterior at the first level. The project would include two centrally-located ten-unit Green Court residential buildings, as well as one eight-unit version of this building type located to the southwest of the site near the R.C. Roberts office building.
- (ii) **Live/Work Row Townhouses:** The proposed Row Townhouse buildings would consist of combinations of two to five attached units. (See Figure 4: Green Court Building and Row Townhouse Building - First Level Plans.) These Row Townhouse buildings would be three stories or 36 to 41 feet tall. With the exception of two groups of Row Townhouses that would front on Larkspur Landing Circle East, the rest of these buildings would front on roadways internal to the site. Private pedestrian access to each unit would be from the street, and private open spaces would be located along the street frontage, while vehicular access would be from the rear of the buildings. The Row Townhouse buildings would be designed to accommodate home-based occupations. The ground-level street frontage of individual units could be used either as a business space or an additional flexible living area. The project would include one two-unit, two three-unit, two four-unit, and two five-unit Row Townhouse structures located on the southern half of the site interspersed among other residential buildings.



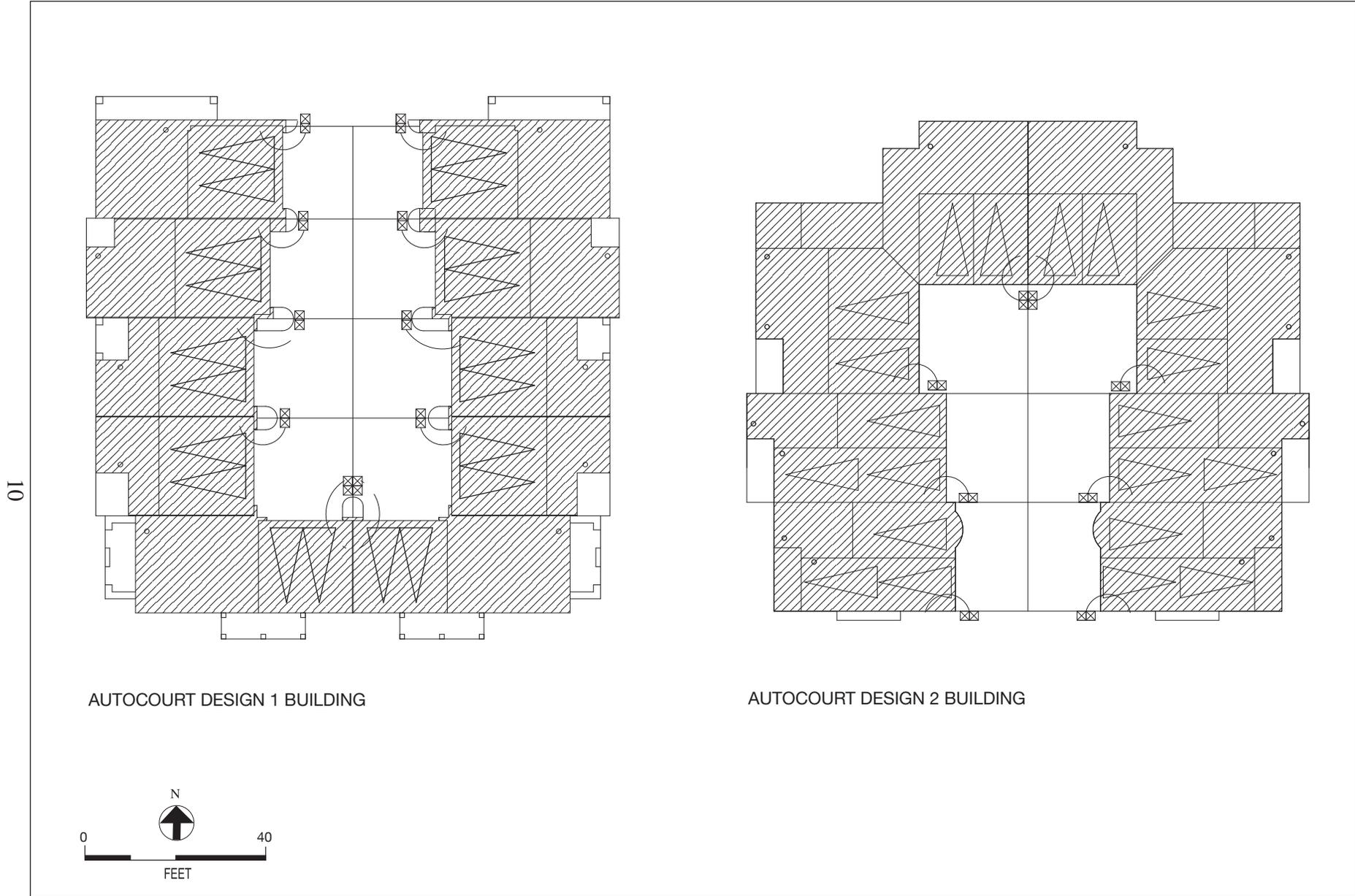
SOURCE: Land Development Solutions Inc.

FIGURE 4: GREEN COURT BUILDING AND ROW TOWNHOUSE BUILDING - FIRST LEVEL PLANS

- (iii) Auto Court Design 1: This building type would arrange ten-unit, two- to three-story, 39- to 41-foot-tall attached townhouses in a U-shaped layout around a central automobile court. (See Figure 5: Auto Court Design 1 and 2 Buildings - First Level Plans.) Garages would open onto the interior central automobile court. Private pedestrian access and enclosed private and communal open spaces for residents would be provided on the outside of the “U.” The project would include four residential buildings of this type located along the southern edge of the site adjacent to the Brick Kiln property.
- (iv) Auto Court Design 2: This building type would be a variation of Auto Court Design 1. The variation accounts for the steeper slope on the northeast portion of the project site. The project would include two residential buildings of this type. The buildings would be three stories above a parking level and 46 feet tall. There would be eight townhouses and eight stacked flats in each of the two buildings. Each building would be arranged in a U-shaped layout around a central automobile court similar to Auto Court Design 1. (See Figure 5: Auto Court Design 1 and 2 Buildings - First Level Plans.) Other features, including garage doors opening onto the automobile court, would be the same as Auto Court Design 1.

The design of the courtyard-style residential buildings would incorporate porches, balconies, arbors, trellises, bay windows, and gable roof forms. Exterior finishes for all the courtyard-style residential buildings would include stone and brick accents to link these new buildings to the site’s history of brick-making and stone quarrying. The design of the Live/Work Row Townhouse buildings would incorporate a mix of stucco and siding materials, metal-framed canvas awnings, bay windows and front yards. Open space for the residents would be provided in the form of private patios, and semi-private landscaped courtyards and gardens. A neighborhood-scale mini park, incorporating a children’s play area, would be located within the southern residential portion of the site. Open green spaces between residential buildings would incorporate pedestrian pathways leading to individual residential units. Residential clusters would be oriented to maximize views of ferry activity at the Golden Gate Ferry Terminal, Corte Madera Creek, Mount Tamalpais, and the hills surrounding Miwok Park, from the individual residential units.

Park Area Dedication. The project sponsor proposes to dedicate approximately 10,000 sq. ft. of park area near the northeast corner of the site for the expansion of Miwok Park. This park area dedication would also allow for the provision of a public pedestrian trail connecting Lincoln Village Circle to Miwok Park; a portion of this pedestrian trail would run through the site of Ecumenical Association for Housing’s (EAH) affordable housing project approved to the north of the project site. This 10,000 sq. ft. of park



SOURCE: Land Development Solutions Inc.

area proposed to be dedicated for the expansion of Miwok Park would be designated in the General Plan as “Open Space (Parkland),” similar to Miwok Park.

Project Access

Vehicular and Pedestrian Access. Vehicular access to the proposed hotel, all residential buildings, and the Sanitary District’s replacement office space and main employee/visitor parking area at the lower level would be from Larkspur Landing Circle East. Lincoln Village Circle would provide vehicular access to the maintenance facilities portion of the Sanitary District No. 1 building and its upper level storage yard and parking area. No vehicular access is proposed from East Sir Francis Drake Boulevard; only pedestrian access would be provided. New landscaped edge conditions are proposed along East Sir Francis Drake Boulevard, Larkspur Landing Circle East, and Lincoln Village Circle roadways.

An internal east-west Spine Road is proposed to bisect the project site. (See Figure 2: Project Site Plan.) The Spine Road would separate the hotel and Sanitary District facilities on the northern half of the site from the main residential areas to the south. The proposed alignment of the Spine Road would provide pedestrian, vehicular, emergency, and handicap access to Miwok Park. It would also provide vehicular access to the 23-unit Monahan Pacific residential project immediately east of the project site.¹ Access to the residential portions of the project site would be from two landscaped roundabouts at either end of the Spine Road. Secondary internal roadways would include: (i) the Spur Road, which is planned to begin at the western roundabout of the Spine Road and meander through the southern residential portion of the site; (ii) the Southeast Driveway, which is planned to branch off from the Spur Road and run parallel to the east-west Spine Road through the southern residential portions of the site; (iii) the Link Road, which is planned to branch off from the Southeast Driveway, intersect with the eastern roundabout of the Spine Road and lead up to the small northeastern residential portion of the site; and (iv) the Loop Road, which would begin and end at the Spur Road and provide vehicular access to the southwestern residential buildings. The proposed edge landscaping detail would be continued from the adjoining public roadways into the site along the internal Spine and Spur Roads. All internal roadways would remain private and be maintained by a homeowner’s association.

Pedestrian access would be available through a network of internal paths and trails; these paths and trails would connect to adjoining facilities, such as Miwok Park, Remillard Park, Sir Francis Drake Boulevard bike path, Larkspur Landing Shopping Center, Golden Gate Ferry Terminal, and the Brick Kiln building. No bikeways are proposed within the project; however, bike racks would be provided at the hotel entrance, the Sanitary District No. 1 building, and the mini park.

¹ This would reduce the need for a left-turn access to Drake’s Cove from Sir Francis Drake Boulevard.

Project Parking. The hotel site includes 78 surface parking spaces for employees and guests. The hotel would have an L-shaped surface parking lot to the east and south of the hotel building. (See Figure 2: Project Site Plan.) The Sanitary District No. 1 site includes 44 surface parking spaces for employees and visitors. Twenty-eight of these spaces would be provided in the lower-level parking lot immediately south of the Sanitary District building, and the remaining sixteen spaces would be provided in the upper-level lot immediately west of the building. A total of about 264 parking spaces would be provided for the proposed residential uses. The 222 off-street parking spaces proposed in the residential buildings would provide an average of 1.76 spaces per residential unit in enclosed garages at the first levels of residential buildings. Forty-two on-street parking spaces would be provided for residents (13 spaces) and guests (29 spaces) along internal roadways on the project site.

Grading Plan

Most of the site is a nearly level area, sloping gently to the south as a result of grading the site after demolition of the Sanitary District No. 1 wastewater treatment plant in 1998. Flanking the level area to the northwest, north, and northeast are steep hillslopes with remnants of rock outcroppings resulting from quarrying operations carried out on the project site prior to 1948. These slopes are generally inclined 2:1 (horizontal to vertical) or 45 degrees, with a portion of the slope to the northwest inclined at a steeper 50 degrees. The soils on the project site are currently made up of artificial fill and surface soils, underlain by bedrock. Fill was placed when the Sanitary District No. 1 wastewater treatment plant was constructed on the site of the quarry in 1948, and again when this wastewater treatment plant was demolished and the project site was graded in 1998.

Some cutting and filling of the project site would be required in order to construct the proposed mixed-use development. The project sponsor therefore proposes to implement a grading plan involving cutting about 25,000 cubic yards (cu. yd.) of soil and rock from the more steeply inclined site areas, and placement of up to 50,000 cu. yd. of fill to raise the level of lower site areas. Overall, the implementation of the proposed grading plan would require the importation of up to 25,000 cu. yd. of fill material from off-site sources, raising the fill areas by 18 to 24 inches.

Project Approvals

The project would require the following approval actions:

- General Plan Amendment, including (i) changing the General Plan Land Use Map designation for the project site from Administrative and Professional Offices and Medium Density Residential (up to 12 dwelling units/acre) to Commercial, Residential High Density (up to 21 dwelling units/acre), Public Facilities, and Open Space (Parkland) for the 10,000 sq. ft. of site area

proposed to be dedicated for expansion of Miwok Park; (ii) making General Plan text amendments, including adding an exception to the maximum floor area ratio (FAR) requirement for the Commercial land use designation in order to permit hotel use with a maximum FAR of 1.0; and (iii) deleting the General Plan requirement for providing some park space as a buffer to Tubb Lake in Miwok Park.

- Preliminary Development Plan, to establish development standards for the proposed uses of the project, pursuant to Section 18.55.060. The standards requested are:
 - Hotel and Sanitary District: C-2 Commercial District Regulations (Chapter 18.48)
 - Residential Use: R-3 Third Residential District Regulations (Chapter 18.32)
- Circulation Assessment Permit, accompanied by a Traffic Impact Study prepared for the project and approved by the City's Traffic Engineer, to demonstrate that (i) the project is consistent with the *Larkspur General Plan*; and (ii) the project sponsor is paying the requisite traffic impact fees that would provide the project's proportionate share of the funds necessary to construct transportation improvements to help reduce the project's transportation impacts.
- Exceptions to the Zoning Ordinance, to allow for (i) changing the residential FAR from 0.6 to 0.85 (Sections 18.35.040 and 18.32.130); (ii) increasing the C-2 Commercial District's 25-foot height limit to 57 feet and R-3 Third Residential District's 35-foot height limit to 46 feet (Sections 18.48.040 and 18.48.040B); (iii) reducing off-street parking requirements for the proposed residential and hotel components by about 17 and 6 parking spaces, respectively (Sections 18.56.060 and 18.56.100B); and (iv) waiving the minimum 8-foot side yard and 15-foot rear yard setback requirements for one of the proposed row townhouse residential buildings located near the southeastern end of the site (Section 18.32.060).
- Heritage Tree Removal Permit, to allow the removal of 54 of the 59 heritage trees on the site. According to the City of Larkspur Heritage Tree Ordinance (see Chapter 12.16), a heritage tree is defined as (i) a live tree or a grove of live trees of historical significance; or (ii) any live tree which has a trunk with a circumference of 50 inches or more, measured at 24 inches above grade.
- Grading Permit, to allow the cutting of approximately 25,000 cu. yd. of soil and rock from certain steeply inclined site areas, and placement of approximately 50,000 cu. yd. of fill to raise the level of lower site areas.
- Precise Development Plan, including detailed information about site topography, existing site features, density of proposed uses, and project design (including location and orientation of proposed buildings), to allow the inclusion of a mixture of uses, building intensities or design characteristics that would not normally be permitted in any single use district.
- Design Review of the proposed multi-family residential development, hotel, office building, and public facility.
- Subdivision Map, to create the parcels for the proposed hotel, residential uses, and replacement Sanitary District facility, and for residential condominium purposes.

SURROUNDING LAND USES AND SETTING

The proposed project site is on the San Quentin peninsula in the City of Larkspur. Mount Tamalpais is about four miles southwest of the site and San Quentin State Prison is approximately two miles east of the site. Regional access to the project site from the north and south is provided by U.S. Highway 101, and

from the east by the Richmond-San Rafael Bridge (Interstate 580). The project site is also located near the Golden Gate Ferry Terminal, and the Marin Airporter bus terminal at 300 Larkspur Landing Circle.

West of U.S. 101, the area north of Sir Francis Drake Boulevard is occupied by a mix of single- and multi-family residential uses surrounded by quarried hillsides. The area south of Sir Francis Drake Boulevard is occupied by a mix of commercial, residential, and administrative uses. North and northwest of the project site are multi-family residential uses, hotel, and institutional and recreational uses, including the Larkspur Court Apartments at 100 Old Quarry Road; Lincoln Village Apartments at 700 Lincoln Village Circle; Courtyard by Marriott Hotel at 2500 Larkspur Landing Circle; a daycare facility housed in the historic Remillard Cottage at 2900 Larkspur Landing Circle; and a neighborhood park. To the west of the site between U.S. 101 and Larkspur Landing Circle are commercial developments such as the Larkspur Landing Shopping Center at 2257 Larkspur Landing Circle, the Gateway office development at 17 Sir Francis Drake Boulevard, the Bosco office building at 100 Larkspur Landing Circle, the Century Theaters at 500 Larkspur Landing Circle, the Gamma Building at 101 Larkspur Landing Circle, and the Larkspur Landing Office Park at 700-900 Larkspur Landing Circle. The Larkspur Landing Shopping Center includes a large retail space currently occupied by Bed Bath & Beyond and a physical therapy clinic, among other shops and restaurants, on the side nearest the project site.

The project site itself is bound on the south by East Sir Francis Drake Boulevard with the Corte Madera Creek estuary beyond, and by Larkspur Landing Circle East on the west with the Larkspur Landing Shopping Center beyond.² The site is flanked by two office buildings along East Sir Francis Drake Boulevard: the Remillard Brick Kiln office and restaurant building to the east at 125 East Sir Francis Drake Boulevard, and the R.C. Roberts office building to the west at 2200 Larkspur Landing Circle. The Remillard Brick Kiln building is protected by a Heritage Preservation District overlay zoning designation, and was renovated and adapted as part of the construction of an office development on that site.

Remillard Park is immediately south of East Sir Francis Drake Boulevard, facing the project. South of Remillard Park, across the mouth of Corte Madera Creek, is the Golden Gate Ferry Terminal. The land from East Sir Francis Drake Boulevard to Corte Madera Creek is designated “Shoreline/Marsh Conservation” in the *Larkspur General Plan*, Land Use and Circulation Map. A multi-purpose path accommodating bicyclists and pedestrians parallels much of East Sir Francis Drake Boulevard along its

² Sir Francis Drake Boulevard is a key east-west through road in Marin County stretching from Point Reyes on the west to the San Quentin Peninsula on the east. The road carries both local and through traffic. The segment east of U.S. Highway 101 is known as East Sir Francis Drake Boulevard. East Sir Francis Drake Boulevard provides an important link for regional traffic between the Richmond-San Rafael Bridge (Interstate 580) and U.S. Highway 101.

south side, beginning at the eastern Larkspur City limit and ending at the western terminus of South Eliseo Drive.

To the immediate north, the entire length of Lincoln Village Circle originating at Larkspur Landing Circle East, is part of the project site except for a small triangle of land that is owned by EAH (Ecumenical Association for Housing). Lincoln Village Apartments, EAH, the City of Larkspur and other public agencies have the right of ingress and egress over the improved portion of Lincoln Village Circle located on the project site. Miwok Park and undeveloped tree-covered hills are to the north and northeast of the site. Miwok Park is a landlocked parcel of land between the Monahan Pacific property and the project site; its principal feature is Tubb Lake, which is a small man-made freshwater lake. Tubb Lake is a remnant of the brick-making operation that existed on the project site and some of the surrounding property in the late 19th and early 20th centuries. Beyond Miwok Park and the Monahan Pacific property is the City of San Rafael corporate boundary.

The undeveloped hilly lands adjacent to the project site to the north and east are the property of EAH and Monahan Pacific, respectively. A residential development proposal has been recently approved by the City of Larkspur, allowing the construction of 24 affordable housing units by EAH on the northern property and another 23 market-rate housing units by Monahan Pacific property on the eastern property.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors, indicated below by a blackened box (■), would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology / Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation / Traffic |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | |

EVALUATION OF ENVIRONMENTAL IMPACTS

I. AESTHETICS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) The project site derives much of its character from the natural setting. Mt. Tamalpais and the coast range mountains in the distance serve as the backdrop to the entire area. The *Larkspur General Plan* has the following description of visual impressions for westbound motorists on East Sir Francis Drake Boulevard:

Looking west across the channel, the motorist has a view of Mount Tamalpais and its descending ridges, which provide a spectacular backdrop to the horizontal line of urban development in the middle-ground and water in the foreground. This view is interrupted by Remillard Park at the official boundary of Larkspur and urban development intensifies at the Remillard Brick Kiln (office building) and Larkspur Landing Shopping Center on the right, with the triangular space frame of the Larkspur Ferry Terminal looming on the left. The motorist continues under the pedestrian bridge that connects the Ferry Terminal with the shopping center, past two major intersections...before coming to the congested and signalized intersections of the Highway 101 on- and off-ramps. Once past the intersections and under the freeway, the view of Mount Tam again opens up, but attention must be paid to the lines of traffic converging onto the four-lane Sir Francis Drake Boulevard. On the right and above are the houses of Greenbrae. On the left are the offices of Drake's Landing and the Bon Air Shopping Center. The impression is one of increasing traffic congestion.³

³ City of Larkspur, *Larkspur General Plan 1990-2010*, Appendix A, "Description of Gateways," December 1990, pp. 195-196.

The project site is located in a bowl-shaped valley and on south- and southwest-facing hills that surround the valley, north of the Corte Madera Creek estuary to San Francisco Bay. The slopes of the northern and eastern boundaries are covered with mature trees and native grasses, part of the coast live oak woodland and grassland that characterizes the area above the site to the north and east. Miwok Park, including Tubb Lake, is northeast of the site. The western edge of the project site is bound by the east end of Larkspur Landing Circle East and lined with street trees. Sweet gum (*Liquidambar styraciflua*) trees planted along the Brick Kiln property's northern edge define a portion of the project site's southeastern boundary.

The project site has extensive views of the Corte Madera Creek estuary and San Francisco Bay. The Golden Gate Ferry Terminal at the mouth of Corte Madera Creek is southwest of the site, and Mount Tamalpais is visible further to the southwest. The project site is at a prominent location along East Sir Francis Drake Boulevard and clearly visible from many vantage points such as East Sir Francis Drake Boulevard, Larkspur Landing Circle East, the Golden Gate Ferry Terminal and from incoming and outbound ferries. The site is visible in the distance from the Corte Madera Creek marshes and the Greenbrae Boardwalk.

The existing structures on the project site include two temporary trailer office structures; three small, one-story equipment storage and maintenance sheds; two fuel dispensers and above-ground storage tanks; a pump house for the force main carrying sewage to the Central Marin wastewater treatment plant; and a parking lot for District employees. The rest of the site is vacant, predominantly unpaved land. The flat portions of the site are used for temporary parking by ferry patrons attending San Francisco Giants weekday daytime baseball games, as the ferry parking lots generally are full of commuter vehicles on weekdays. The project sponsor proposes to remove the existing on-site District No.1 facilities and construct a mixed-use development including 16 multi-family residential buildings, a hotel, and replacement facilities for Sanitary District No. 1.

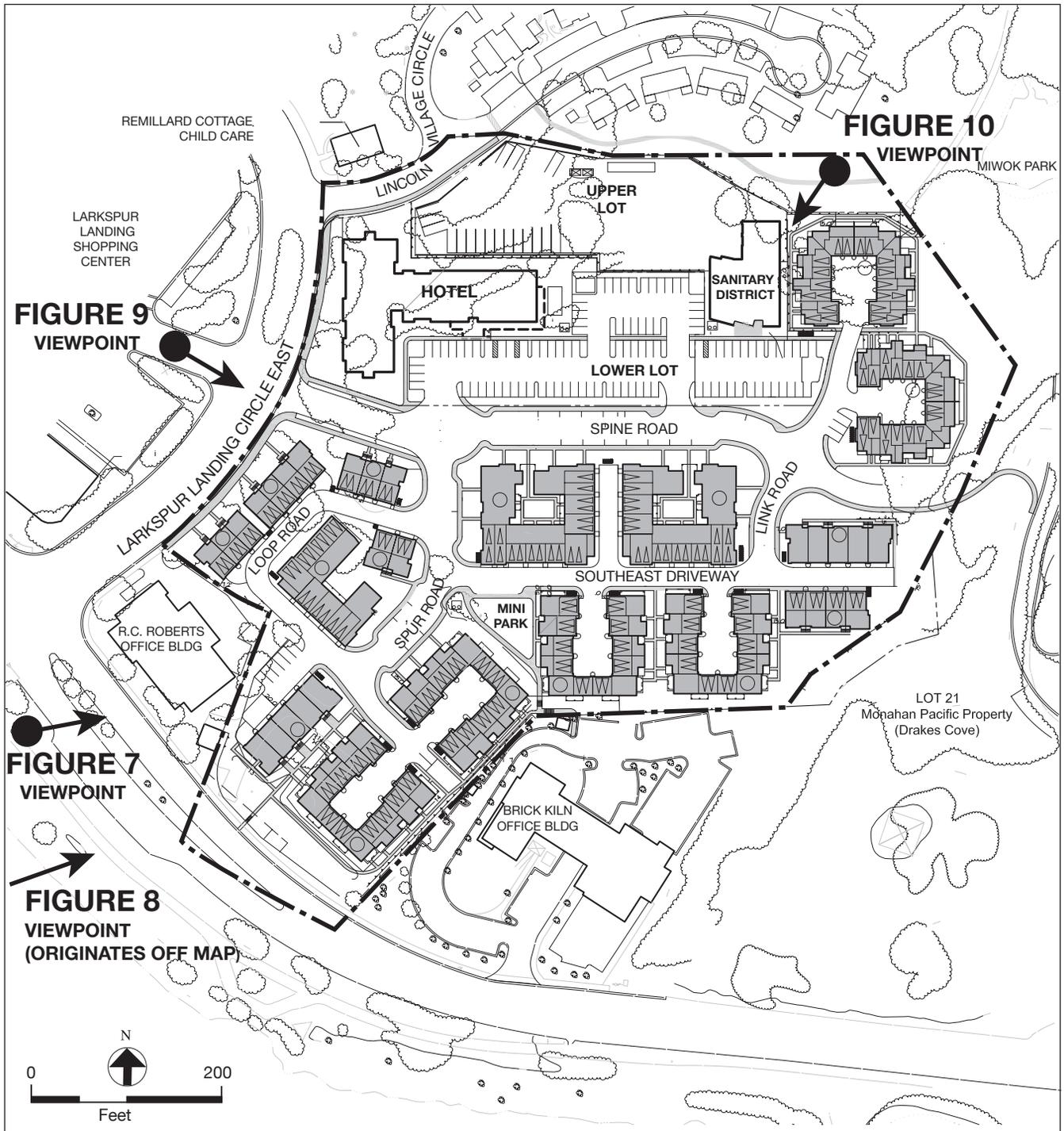
The project would introduce 18 two- to four-story buildings on the project site. The design of these buildings is conceptual at present. Preliminary hotel drawings show that it would have a combination of pitched and gabled roofs and a composite facade of wood siding and plaster walls uniformly punctuated by double windows on all sides (see Figure 3: Conceptual Hotel Elevations on p. 6). The design of the replacement Sanitary District building has not been developed; it is expected to have a simple, unobtrusive design. The design of the nine courtyard-style residential buildings would incorporate porches, balconies, arbors, trellises, bay windows, and gable roof forms. The brick accents planned for the courtyard-style residential building façades would be compatible with the brick and wood composite facades of the Remillard Brick Kiln and its office

building addition and the R.C. Roberts building. The design of the Live/Work Row Townhouse buildings would incorporate a mix of stucco and siding materials, metal-framed canvas awnings, bay windows and front yards. The hotel and several of the residential buildings would be oriented to maximize views of ferry activity at the Golden Gate Ferry Terminal, Corte Madera Creek, and Mount Tamalpais.

Photographic views from four locations have been prepared to illustrate existing conditions in the project vicinity and at the project site (see Figure 6: Location of Views). Each existing view (denoted as “A. Existing”) in Figures 7-10 is shown for comparison alongside a visual simulation of the proposed project in the existing view (denoted as “B. Proposed Project”). These photographic views, illustrating the visual changes that would occur in the existing setting with development of the proposed project, were prepared in order to help decision makers and interested members of the public evaluate the impact of the proposed project on existing views. The views with the visual simulation of the proposed project show the general scale and massing of project buildings including roofs and major protrusions. Building elevation details, such as placement of windows, are shown for the hotel and residential buildings that appear in the photomontages, but not for the new Sanitary District building.

Under existing conditions, the public view corridor from East Sir Francis Drake Boulevard and the sidewalk along East Sir Francis Drake Boulevard on the north bank of Corte Madera Creek, as shown in Figure 7: View From East Sir Francis Drake Boulevard, looks north towards the two-story R.C. Roberts office building (above one level of parking) partially obscured by trees and shrubs, a pump house on the project site for the force main to the Central Marin wastewater treatment plant, the Remillard Brick Kiln office building and historic smokestack, and surrounding live oak woodland and grassland beyond. This view is available to pedestrians and eastbound vehicular traffic on East Sir Francis Drake Boulevard.

A comparison of the existing view from East Sir Francis Drake Boulevard and the same view with a superimposed visual simulation of the proposed project, as presented in Figure 7, shows that two of the proposed residential buildings—a 36-foot-tall Live/Work Row Townhouse building and a 39-foot-tall Auto Court Design 1 building—located near the southern edge of the site along East Sir Francis Drake Boulevard would temporarily obstruct views of the Remillard Brick Kiln office building, part of the historic smokestack, and surrounding oak woodland and grassland, for eastbound traffic on East Sir Francis Drake Boulevard and for pedestrians walking along the adjacent pedestrian pathway. Within the proposed development, these two residential



SOURCE: Turnstone Consulting

LEGEND

 PROPOSED RESIDENTIAL BUILDINGS



EXISTING VIEW



PROPOSED VIEW

SOURCE: Square One Productions, Turnstone Consulting

TURNSTONE CONSULTING

2000 LARKSPUR LANDING CIRCLE PROJECT

FIGURE 7: VIEW FROM EAST SIR FRANCIS DRAKE BOULEVARD, EXISTING AND PROPOSED

buildings would be set back over 50 feet from East Sir Francis Drake Boulevard; trees and other plant material proposed to be planted in setback areas along the perimeter of these proposed buildings' street frontages would also be visible from this viewpoint. The rest of the proposed project development, including 14 of the 16 residential buildings, the hotel, and the replacement facility for Sanitary District No. 1, would not be visible from this viewpoint.

The existing view from the Golden Gate Ferry Terminal looking northeast, as shown in Figure 8: View From Golden Gate Ferry Terminal, is similar to the existing view from East Sir Francis Drake Boulevard described above. Under existing conditions, long-range views (across Corte Madera Creek) of the R.C. Roberts office building, the pump house on the project site, the Remillard Brick Kiln office building and historic smokestack, and the surrounding live oak woodland and grassland on the northern and eastern slopes behind the project site are visible from the ferry terminal and to inbound and outbound ferry traffic. Behind the pump station, the roof of the existing Sanitary District facility administration trailer is partially visible, as is a small portion of the parking area in the center of the project site.

A comparison of the existing view from the ferry terminal and the same view with a visual simulation of the proposed project, as presented in Figure 8, shows that the view of the Remillard Brick Kiln office building and historic smokestack would be partially obstructed by the two proposed residential buildings—the 36-foot-tall Live/Work Row Townhouse building and the 39-foot-tall Auto Court Design 1 building—located along the southern edge of the site adjacent to East Sir Francis Drake Boulevard. The view of the live oak woodland and grassland behind the Remillard Brick Kiln office building would be partially obstructed. A 40-foot-tall Green Court residential building (with trees along its street frontage) proposed on the southwest portion of the site would be partially visible behind the R.C. Roberts office building. The rest of the proposed project development, including 13 of the 16 residential buildings, the hotel and new Sanitary District No. 1 building, would not be visible from this viewpoint.

Under existing conditions, the view from the Larkspur Landing Shopping Center looking east, as shown in Figure 9, depicts the shopping center's vehicular entrance/exit off Larkspur Landing Circle East in the foreground, with trees and a variety of plant material bordering the vehicular entrance/exit. Further in the distance on the left of the photograph can be seen the historic Remillard Cottage occupied by a daycare facility. Street trees in the median and on the edges of Larkspur Landing Circle East, and the existing trees and shrubbery on the western portion of the



EXISTING VIEW



PROPOSED VIEW

SOURCE: Square One Productions, Turnstone Consulting

TURNSTONE CONSULTING

2000 LARKSPUR LANDING CIRCLE PROJECT

FIGURE 8: VIEW FROM GOLDEN GATE FERRY TERMINAL, EXISTING AND PROPOSED



EXISTING VIEW



PROPOSED VIEW

SOURCE: Square One Productions, Turnstone Consulting

TURNSTONE CONSULTING

2000 LARKSPUR LANDING CIRCLE PROJECT

FIGURE 9: VIEW FROM LARKSPUR LANDING SHOPPING CENTER, EXISTING AND PROPOSED

project site are shown in the center and on the right. Beyond that, the live oak woodland and grassland on the northeastern slopes edging the project site are partially visible behind the Remillard Cottage and the existing vegetation on the project site. This view is available to pedestrians, bicyclists, and vehicular traffic exiting the shopping center's driveway on Larkspur Landing Circle East.

A visual simulation of the project in the existing setting, as presented in Figure 9: View from Larkspur Landing Shopping Center, shows the 57-foot-tall hotel, the internal east-west Spine Road branching from Larkspur Landing Circle East and proposed to run through the middle of the project site, and two 38-foot-tall, Live/Work Row Townhouse buildings on the southern side of the Spine Road across from the hotel. Two 37- to 38-foot-tall Green Court residential buildings abutting the southern edge of the Spine Road would be partially visible behind the two Live/Work Row Townhouse buildings. The western façade of the hotel, with its combination of pitched and gabled roofs, overhangs and windows, would be visible from this vantage point. From this viewpoint, the visibility of the hotel would be limited by existing street trees in the median and on the edges of Larkspur Landing Circle East, existing trees bordering the vehicular entrance/exit and along the eastern perimeter of the shopping center. Over time, views of the hotel's western frontage facing Larkspur Landing Circle East would be further obscured by trees proposed to be planted in areas along the western perimeter of the project site. Likewise, existing street trees in areas along the eastern perimeter of Larkspur Landing Shopping Center would limit the visibility of the four proposed residential buildings depicted in this view. Over time, views of these residential building would be further obscured by trees proposed to be planted in areas along the western perimeter of the project site and by street trees proposed to be planted along the edges of the internal Spine Road. Figure 9 demonstrates that views of the proposed development on the project site from Larkspur Landing Shopping Center would be substantially blocked by existing trees in the vicinity and trees proposed to be planted within the proposed development. The replacement facility for Sanitary District No. 1 would be completely shielded by the hotel from this vantage point. With development of the proposed hotel, views of the surrounding live oak woodland and grassland on the northeastern slopes would be further obstructed from this vantage point.

Under existing conditions, the view from the northeast portion of the project site looking south,⁴ as shown in Figure 10: View from Northeast Portion of the Site, depicts live oaks, shrubs and grasses on the northeastern slopes of the project site in the foreground. Further in the distance a portion of the tree-covered ridge edging the eastern boundary of the project site can be seen, as well as the gently sloping grass-covered central portion of the project site, and the Remillard Brick Kiln office building and historic smokestack, partially obscured by trees and shrubs in the foreground. Coast range hills would be visible in the background behind the Brick Kiln office building and smokestack.

A visual simulation of the project in the existing setting, as presented in Figure 10, shows the proposed 46-foot-tall Auto Court Design 2 residential building near the northeastern corner of the project site and the adjacent 33-foot-tall replacement facility for Sanitary District No. 1. The upper floors of the northern façade of the residential building, with its gable roof, overhangs, and balcony, would dominate views from this vantage point; over time, trees proposed to be planted in areas around the perimeter of the residential building's northern frontage would partially block views of this building. As explained above, the Sanitary District building design is not yet finalized; therefore, the photomontage is representative of what a viewer might see of the general massing of this building. Over time, trees proposed to be planted around the perimeter of the District facilities would partially block views of this building, but it would remain a dominant feature from this vantage point. The existing long-range views of the Remillard Brick Kiln office building and historic smokestack and the tree-covered ridge edging the eastern boundary of the project site would be completely obstructed by these two proposed buildings. The rest of the proposed development on the site would not be visible behind these two buildings. The hills in the background would still be visible between the buildings and possibly above the Sanitary District building, depending on the size and thickness of vegetation. The extent of long-range views would increase at locations further up the hill toward Miwok Park, adding portions of the proposed hotel building, some of the residential buildings proposed in the central and southwestern portions of the site, the R.C. Roberts office building to the west if not obscured by planting, and the tree-covered ridge edging the northeastern boundary of the project site. The peak of Mount Tamalpais would continue to be visible from Tubb Lake in Miwok Park, while views of the proposed development below would be obscured by the dense tree cover on the Tubb Lake dam and slopes edging the park.

⁴ The location of this viewpoint is from the park area (approximately 10,000 sq. ft. of area) near the northeast corner of the project site proposed to be dedicated for the expansion of Miwok Park.



EXISTING VIEW



PROPOSED VIEW

SOURCE: Square One Productions, Turnstone Consulting

TURNSTONE CONSULTING

2000 LARKSPUR LANDING CIRCLE PROJECT

FIGURE 10: VIEW FROM NORTHEAST PORTION OF THE SITE, EXISTING AND PROPOSED

As demonstrated by the four photomontages, the project would constitute a substantial visual change in the existing physical environment north of East Sir Francis Drake Boulevard and east of Larkspur Landing Circle East. The proposed project would increase the scale (height and bulk) of development on the project site. These buildings would be taller but comparable in bulk to the adjacent buildings such as the existing three-story Remillard Brick Kiln office building and the two-story R.C. Roberts office building (above one level of parking) that flank the project site along East Sir Francis Drake Boulevard. The tallest building proposed on the site, the 57-foot-tall hotel, would be well below the height of the historic smokestack associated with the Remillard Brick Kiln office building.

Overall, the four photomontages show that the project would have the following effects on existing views: Figure 7 shows that the proposed development would temporarily obstruct views of the Remillard Brick Kiln office building and smokestack, and surrounding oak woodland and grassland, for eastbound traffic on East Sir Francis Drake Boulevard and for pedestrians walking along the adjacent pedestrian pathway. Figure 8 shows that the proposed development would also obstruct views of the Remillard Brick Kiln office building and part of the smokestack and surrounding oak woodland and grassland, from the ferry terminal. Figure 9 demonstrates that the proposed project would have a limited effect on the existing view from Larkspur Landing Shopping Center. Figure 10 shows that long-range views of the Remillard Brick Kiln office building and historic smokestack, and the tree-covered ridge edging the eastern boundary of the project site, would be completely obstructed by the two project buildings—the 33-foot-tall Sanitary District building and the 46-foot-tall residential building—proposed to be located near the northeastern portion of the site, but the coast range hills in the background would still be visible.

According to the significance criteria established by the Larkspur Planning Commission for the project site,⁵ the project would be considered to have a significant effect on views if it would: (i) continuously and substantially limit or block a major scenic view or view of an historic resource when viewed by a pedestrian walking along a footpath in a public park; (ii) substantially obstruct the public view corridor from Tubb Lake to Mount Tamalpais; or (iii) substantially obstruct the dominant public view of the Remillard Brick Kiln, a National Register structure. The project would not block or replace a major scenic view of the project site, as it is currently essentially

⁵ Larkspur Planning Commission Staff Report regarding the public scoping meeting for GPA/PDP/PD District CAP 00-16 Campus Cornerstone Larkspur, LLC; 2000 Larkspur Landing Circle, AP# 018-171-32 on February 21, 2004. The significance criteria presented to the Planning Commission were revised based on Commissioners' comments at the February 21, 2004 scoping meeting.

vacant land with a few scattered single-story industrial structures. It would partially obstruct views of the woodlands and grasslands on the north and northeast slopes of the project site and the slope of the Tubb Lake dam from nearby streets and the Ferry Terminal, but this would not constitute a significant visual impact. The proposed project would not block views of Mount Tamalpais or substantially obstruct the public view corridor from Tubb Lake to Mount Tamalpais. Although the project would affect existing views from nearby streets, it would not substantially obstruct the dominant public views of a visual/historic resource, such as the Remillard Brick Kiln. This is because the Remillard Brick Kiln has lost much of its historic integrity (as discussed in Cultural Resources, below), the obstruction of views of this building would be considered less than significant. Obstruction of views of the Remillard Brick Kiln building from the adjacent street and pedestrian pathway would be brief, during the few seconds it would take to pass the project site, and the primary view of this building is from in front of the Remillard Brick Kiln property.

According to the significance criteria, the project would also be considered to have a significant visual impact if it would result in a building or structure whose highest element is within 100 vertical feet of the Southern Heights ridgeline as delineated on the Larkspur Zoning Map. The proposed project would increase the amount of development on the site and increase the scale (including the height and bulk of the buildings) of development on the site, but it would not develop any structure on the project site that is within 100 vertical feet of the Southern Heights ridgeline. Therefore, although constituting a substantial visual change, the proposed project would have a less-than-significant visual impact on the existing physical environment of the project area.

- b) There are no important scenic resources on the project site. The property is the former location of the Sanitary District No. 1 wastewater treatment plant, demolished in 1998. The project calls for removal of 54 of the 59 heritage trees from the project site. Mitigation Measure Bio4 included in the project to replace heritage trees at a ratio of 4:1 or 2:1, depending on the size of the removed tree, would reduce the impact to less than significant. (See IV. Biological Resources, below.)
- c) Mount Tamalpais and the coastal range in the distance serve as the backdrop to the entire area. As discussed under “a” above, the project would not substantially degrade the existing visual character or quality of the site or its surroundings. Therefore, the project would have a less-than-significant impact on existing visual character.

- d) The proposed project would include outdoor lighting typical of mixed-use developments of the same scale; no unusual amount of light or glare would be created that would interfere with nighttime views. The existing neighboring developments, such as the R.C. Roberts office building and the Remillard Brick Kiln office building, also include outdoor lighting. Outdoor lighting on parking lots for the hotel and Sanitary District buildings, and any bright lights inside the buildings at windows, could add glare that would affect nighttime views from nearby residential buildings. Mitigation Measure Aes1 would reduce potential light and glare impacts on the surrounding residential uses from the lighting associated with the Sanitary District and hotel buildings to less-than-significant levels.

Mitigation Measures

Mitigation Measure Aes1. In order to ensure that there would be no adverse light and glare impacts on surrounding residential uses from the Sanitary District and hotel building, exterior lighting from sources greater than 40 watts shall be shielded such that there is no output above a horizontal line parallel to the ground; the exterior light levels shall be 0.2 foot-candles at the dimmest locations of parking lots and no more than 4-5 foot-candles at the brightest locations on each site; and light spill across property lines shall be no more than 0.1 foot-candles and no direct light source shall be visible at the property line. The project sponsor shall submit a detailed outdoor lighting plan, including computer calculations substantiating dimmest and brightest outdoor light levels on the Sanitary District and hotel sites and light levels at property lines, and including fixture data sheets to substantiate shielding. The lighting plan, prepared by a professional lighting consultant, shall be submitted to the City for review and approval prior to issuance of building permits.

See also Mitigation Measure Bio4 described under Section IV, Biological Resources. Mitigation Measure Bio4 calls for replacement of heritage trees removed by the project, and would reduce the project's impact on scenic resources (including loss of heritage trees) to a less-than-significant level.

II. AGRICULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion

- a-c) The project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as defined by the Farmland Mapping & Monitoring Program of the State of California, Department of Conservation. The project would not call for the conversion of any land from agricultural to non-agricultural use. Additionally, the project is surrounded by lands that are already developed, approved for development, or designated parkland area and, therefore, would not increase development pressure on agricultural lands by extending infrastructure into agricultural areas. Therefore, the project would have no impact on agricultural resources.

III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

III. AIR QUALITY (cont'd.)	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-c) The applicable air quality management district for the proposed project is the Bay Area Air Quality Management District (BAAQMD).

Construction Emissions. Demolition, excavation, grading, foundation construction, and other ground-disturbing construction activity would temporarily affect localized air quality for up to about four months, causing temporary and intermittent increases in particulate dust and other pollutants. Excavation and movement of heavy equipment could create fugitive dust and emit nitrogen oxides (NO_x), carbon monoxide (CO), sulphur dioxide (SO₂), reactive organic gases or hydrocarbons (ROG or HC), and particulate matter with a diameter of less than 10 microns (PM₁₀) as a result of diesel fuel combustion. Fugitive dust is made up of particulate matter including PM₁₀. Soil movement for foundation excavation and site grading would create the potential for wind-blown dust to add the particulate matter in the local atmosphere while open soil is exposed.

While construction emissions would occur in short-term, temporary phases, they could cause adverse effects on local air quality. The Bay Area Air Quality Management District (BAAQMD), in its *CEQA Guidelines*, has developed an analytical approach that obviates the need to quantitatively estimate these emissions. The BAAQMD has also identified a set of feasible PM₁₀ control measures for construction activities. In order to reduce the quantity of dust generated during demolition of existing structures, site preparation, and construction, the project

sponsor has agreed to implement Mitigation Measures AQ1 and AQ2, described below, which implement BAAQMD PM₁₀ control measures. With implementation of these measures, construction-related air quality impacts would be reduced to less-than-significant levels.

Traffic Emissions. The BAAQMD has established screening methods to determine whether development projects could exceed significance thresholds for air quality impacts of project operations and therefore require detailed air quality analysis.⁶ The District generally does not recommend a detailed air quality analysis for projects generating fewer than 2,000 vehicle trips per day. The Larkspur Landing project would generate 1,285 trips per day.⁷ Therefore, no detailed air quality analysis is needed, and no significant air quality impacts due to vehicular emissions would be generated by the proposed project.

In addition, the *Larkspur General Plan* contains the following goals and policies:

- Goal 10: “Ensure that air quality levels do not threaten public health and safety.”
 - Policy r: “Seek to comply with state and federal standards for air quality.”
 - Policy s: “Seek to reduce auto travel, and thereby, the pollutants from auto emissions.”
 - Policy t: “Ensure that traffic generated by new development is not the cause of state and federal air quality standards being exceeded in Marin County.”

The BAAQMD *CEQA Guidelines* incorporate the applicable state and federal standards for air quality, so the proposed project conforms to Policy r. The *Larkspur General Plan* commentary notes that, as Larkspur is almost built out, “significant land changes are not likely to occur” that would make a substantial change in the amount of auto use in Larkspur. The proposed project is located near public transit services at the Golden Gate Ferry Terminal and a Golden Gate Transit bus route along East Sir Francis Drake Boulevard, as well as near the Marin Airporter bus terminal. Therefore, locating residential uses on the project site would encourage use of transit for commuting compared to other locations in Larkspur that are less well-served by transit, and locating the hotel within reasonable distance of both the ferry service and the Marin Airporter terminal could reduce the use of automobiles by some hotel patrons. Because the project would generate fewer than 2,000 vehicle trips per day and would not result in significant air emissions, it would not cause state or federal air quality standards to be exceeded, conforming to Policies r and t.

⁶ See BAAQMD *CEQA Guidelines*, April 1996, Revised December 1999, p. 25.

⁷ Dowling Associates, Inc., *Traffic Impact Assessment and Parking Report for 2000 Larkspur Landing Circle*, November 20, 2003, p. 6.

- d) There are sensitive receptors in the project vicinity. The BAAQMD defines sensitive receptors as facilities where sensitive population groups (children, the elderly, the acutely ill, and the chronically ill) are likely to be located. These land uses include residences, school playgrounds, daycare centers, retirement homes, convalescent homes, and hospitals. The closest sensitive receptors to the project site are (i) the Remillard Cottage Children's Daycare Center and adjacent park near the northwest corner of the project site; (ii) the proposed EAH and Monahan Pacific (under construction) residential developments adjacent to the project site to the north and east; and (iii) the apartments further north along Lincoln Village Circle.

Mitigation Measures AQ3 and AQ4, below, list supplemental dust control measures specifically designed to reduce construction impacts on the Remillard Cottage Children's Daycare Center, the adjacent park, the EAH and Monahan Pacific residential development sites adjacent to the project site to the north and east, and nearby apartment buildings during the dust-producing activities at the northwest, north, and northeast corners of the project site. These measures would be implemented by the project sponsor during excavation/earthmoving at the sites of the hotel, Sanitary District facility, and the two residential buildings proposed to be located in the northern portion of the project site.

Implementation of these measures, as well as Mitigation Measures AQ1 and AQ2, to reduce construction-related particulate emissions, would reduce construction dust impacts to a less-than-significant level for nearby sensitive receptors.

- e) The proposed project would include new residential uses, a hotel and replacement facilities for Sanitary District No. 1. There would be no substantial change in the Sanitary District operations. New odors from the residential and hotel buildings, such as cooking odors, would be typical of these uses. The uses proposed on the project site are not expected to create any new objectionable odors.

Mitigation Measures

Mitigation Measure AQ1. In order to reduce the quantity of dust generated during demolition of existing structures, the project sponsor shall employ the following measures: (i) water to control dust generation during demolition of structures and break-up of pavement; (ii) cover all trucks hauling demolition debris from the site; and (iii) use dust-proof chutes to load debris into trucks whenever feasible.

Mitigation Measure AQ2. In accordance with BAAQMD CEQA Guidelines (BAAQMD 1996), the following mitigation, recommended by BAAQMD for construction sites greater than 4 acres in area, shall be implemented in order to reduce short-term construction emissions to less-than-significant levels:⁸

- Water all active construction areas at least twice daily.
- Water or cover stockpiles of debris, soil, sand or other materials that can be blown by the wind.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep daily (preferably with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
- Sweep streets daily (preferably with water sweepers) if visible soil material is carried onto adjacent public streets.
- Hydro-seed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).
- Enclose, cover, water twice daily or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.).
- Limit traffic speeds on unpaved areas to 15 mph.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- Replant vegetation in disturbed areas as quickly as possible.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.

Mitigation Measure AQ3. In order to reduce the quantity of dust generated during site preparation and construction, adjacent to the Remillard Cottage Children's Daycare Center, the EAH housing north of the project site, and the Monahan Pacific residential development east of the project site, the project sponsor or prime contractor shall designate in the construction contract, a person at the superintendent level or higher to be the dust-control coordinator, subject to approval of the Planning Department, and shall provide this person's telephone number to the daycare personnel and homeowners' associations, and post this information on-site, in the nearby park, office buildings, and apartment buildings. This person shall respond to complaints within 24 hours or less and have the authority to take corrective action.

Mitigation Measure AQ4. In order to reduce the quantity of dust generated during site preparation and construction, areas to be disturbed within 100 feet of the children's daycare center and nearby residences shall be presoaked using sprinklers for 48 hours before commencement of excavation or grading activities and overnight each day during the period of excavation and earthmoving.

⁸ This mitigation includes the BAAQMD-recommended Basic, Enhanced, and Optional Control Measures.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The biological resources of the project site have been substantially modified by prior use of the site. In the 1850s, an early brick kiln stripped off the topsoil (and vegetation) to expose clay deposits and used the topsoil to fill tidal inlets at the site. A brick yard was constructed at the site around 1870. The brick yard operator built an earthen dam and impounded what is now known as Tubb Lake. In 1949, Sanitary District No. 1 constructed a wastewater treatment facility on the site that operated until 1985. In 1999-2000, the treatment facility was removed and the site was graded and recontoured. The resources present

on the site today represent several waves of colonization and succession. Some habitats that were once present, e.g., salt marsh, have been eliminated by prior activities.

The current biological resources of the project site have been surveyed several times to describe the biological communities present. The survey reports are on file with the City of Larkspur Planning Department and are summarized here. Approximately 25 percent of the total area of the site is paved. Currently, there are five plant communities on the unpaved portion of the site. The largest is grassland on fill, which occupies about 39 percent of the site. The others are: landscaped/disturbed (about 17 percent), grassland with oaks (about 13 percent), coast live oak woodland (about 6 percent), and wetland (less than 1 percent.)⁹

- a) In preparing this assessment, special status species were evaluated using the California Natural Diversity Database¹⁰ (CNDDDB) for the San Rafael and San Quentin quads where the project is located. CNDDDB shows records for 35 special status plant species or communities within the quads, including four federally endangered species: Tiburon Indian paintbrush, white-rayed pentachaeta, Tiburon jewel-flower, and showy Indian clover. However, none of the 35 special status plant species/communities are found on the site of the proposed project. With one exception, the white-rayed pentachaeta, the appropriate habitat for the species is not present on the project site. A detailed field survey was performed for the white-rayed pentachaeta during its blooming season; it was not observed and is not believed to be present.¹¹

CNDDDB shows records for 20 special status animals within the San Rafael and San Quentin quads, including three federally endangered species: tidewater goby, California clapper rail, and salt marsh harvest mouse. None of these are found on the project site as there are no suitable habitats. The tidewater goby is an aquatic species, found in brackish creeks. The California clapper rail and salt marsh harvest mouse are only found in salt marshes. None of these habitats occur on the project site. Although Tubb Lake is not on the project site, it is immediately adjacent, therefore the possible occurrence of the California red-legged frog there has been

⁹ Total of all percentages may not equal 100 due to rounding.

¹⁰ California Natural Diversity Database, Wildlife & Habitat Data Analysis Branch, Department of Fish and Game, March 1, 2004.

¹¹ Turnstone Consulting, Memorandum to Nancy Kaufman, Larkspur Planning Director, Biological Resources Analysis for 2000 Larkspur Landing Circle Project, June 9, 2004.

evaluated. In 1999, the U.S. Fish and Wildlife Service issued a finding that no individuals have been found within five miles of the project site.^{12, 13}

- b) Based on site visits conducted in 1999 and 2004, there are no riparian habitats and no aquatic vertebrate species on the project site^{14, 15}. There are no other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.¹⁶ Therefore, the project would have no effect on riparian habitat or other sensitive natural community.
- c) There is a small (approximately 0.09 acre) wetland community on the site, located at the base of the Tubb Lake embankment. This area, surveyed in 2001, meets the U.S. Army Corps of Engineers (Corps) criteria for wetland designation. The survey was described in “Preliminary Wetland Delineation, 2000 Larkspur Landing Circle”¹⁷ and the findings were confirmed in 2004.¹⁸ This community would be completely eliminated by the proposed fill. While the Corps has jurisdiction over construction, including placement of fill, in wetlands, it is very unlikely that the Corps would exert their jurisdiction over the small, isolated project site wetland. The impacts associated with the elimination of the wetland can be mitigated (see Mitigation Measures Bio2 and Bio3, below).

The proposed project could also impact the Tubb Lake watershed and other biological resources of Miwok Park by making access to the lake more convenient, and increasing daytime and residential populations near the lake.¹⁹ New residents could have pets that could affect wildlife in Miwok Park. While there are no endangered species in the park, and while some degree of disturbance may occur from the residential development on Lincoln Village Circle, the lakeside and surrounding oak woodland vegetation create excellent wildlife habitat. Mitigation Measures Bio2 and Bio3 would reduce disturbance by people and pets to the lake and its shoreline. With the implementation of Mitigation Measures Bio2 and Bio3, the impact of the project would be less than significant.

¹² Diane L. Renshaw, Consulting Ecologist, letter to Ken Sanchez, USFWS Ecological Services, Sacramento, CA, May 26, 1999.

¹³ Diane L. Renshaw, Consulting Ecologist, letter to Hamid Shamspour, City of Larkspur, July 16, 1999.

¹⁴ Diane L. Renshaw, Consulting Ecologist, letter to Barbara Westree, Turnstone Consulting, April 21, 2004

¹⁵ Turnstone Consulting, Memorandum to Nancy Kaufman, Larkspur Planning Director, Biological Resources Analysis for 2000 Larkspur Landing Circle Project, June 9, 2004.

¹⁶ California Natural Diversity Database, Wildlife & Habitat Data Analysis Branch, Department of Fish and Game, March 1, 2004.

¹⁷ Diane L. Renshaw, Consulting Ecologist, Preliminary Wetland Delineation, 2000 Larkspur Landing Circle, City of Larkspur, Marin County, California, prepared for City of Larkspur, November 16, 2001.

¹⁸ Diane L. Renshaw, Consulting Ecologist, letter to Barbara Westree, Turnstone Consulting, April 21, 2004.

¹⁹ Larkspur General Plan, Chapter 6, Environmental Resources.

The proposed project could also result in an increase in the use of Remillard Park and the biological resources of the Remillard Park-Corte Madera Creek shoreline marsh. The marshes and habitat value at the mouth of the Creek have been greatly altered by flood control installations and by private development. All that remains of the marshes is a narrow fringe along northern and southern segments of the creek edge and small areas preserved at the College of Marin, Piper Park, Redwood High School, the Larkspur Ferry Terminal, and Remillard Park. Pedestrian use of Remillard Park occurs now without substantial damage to the park. It is unlikely that the increase in its use due to the proposed project could be so large as to cause a noticeable change in human effects on the biological resources of the park.

- d) Prior use and disturbance of the site has greatly reduced habitat value and use of the site by wildlife. Nevertheless, there are small resident populations of birds, small mammals, reptiles, and insects. When the project is landscaped following construction, the habitat values of the site could increase, depending on the species planted. Thus, while there is limited daily use of the site by wildlife, the project would not interfere with the movement of any resident or migratory wildlife, or with established migratory corridors, or impede the use of native wildlife nursery sites. The proposed project would not interfere with the movement of any resident or migratory fish in the Corte Madera Channel.
- e) *Larkspur General Plan* Chapter 6, Policies d-f and Action Programs 6-10 seek to maintain natural appearance and habitat values in areas where development is allowed, such as the project site. Development of the proposed project would result in some loss of wildlife habitat; however, as discussed above, the habitat values of the site have been severely degraded by prior use of the site. Implementation of Mitigation Measures Bio1, Bio2, and Bio3 would reduce the conflict of the proposed project with local policies or ordinances protecting biological resources to a less-than-significant level.

In addition, the City's Heritage Tree Ordinance²⁰ prohibits removal of heritage trees without a permit. Trees on the project site are located on the steep hillsides, above the former quarry, and on the western perimeter of the site. The majority of the trees on the hillside have become established since the quarry operation ended (sometime prior to the late 1940's). Trees on the western edge were planted as landscaping for the former sewage treatment plant. In 2004 a tree inventory and assessment that was conducted in 2001 was updated.²¹ The assessment update

²⁰ City of Larkspur Municipal Code Chapter 12.16

²¹ Ralph Osterling Consultants, Inc., letter to Michael Hooper, Campus Properties, LLC, Updated Tree Data for 2000 Larkspur Landing Circle, April 8, 2004.

showed that 59 heritage trees (as defined by the ordinance) were present. This group consists of 47 coast live oaks (native), four willows (native), three Monterey pines (native), two stone pines, two plums, and one deodar cedar. Implementation of the proposed project would result in the removal of 54 of the heritage trees.²² The trees that would be removed are all of those listed above except 5 of the oaks. This impact would be reduced to a less-than-significant level with implementation of Mitigation Measures Bio1 and Bio4.

- f) There are no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans applicable to the project site. Therefore, the project would not conflict with any adopted plans related to habitat on the project site.

Mitigation Measures

Mitigation Measure Bio1. To mitigate the loss of coast live oak and grasslands with oak habitats, the project sponsor shall obtain approval from the City for, and then implement, a landscaping plan using all native species throughout the project site except along Larkspur Landing Circle and along the Spine Road to its intersection with the Spur Road at the entry to the project site. Alternatively, the project applicant may propose an alternative location, either on-site or in the project vicinity, for replacement of the loss of approximately 2.15 acres of habitat on the site at the ratio of 1:1 (acre replaced: acre lost), or restoration of an existing marginal habitat area at the ratio of 2:1 (acres replaced: acre lost). Such alternative shall be reviewed by the City's consultants to determine mitigation adequacy prior to final approval of project landscaping.

Mitigation Measure Bio2. To mitigate the loss of the wetland on the project site, the project sponsor shall provide necessary funding for the City for implementation of ongoing maintenance at Tubb Lake for a period of five years. This maintenance shall be accomplished by: 1) ongoing removal of floating parrot feather vegetation from the lake, 2) ongoing removal of French and Scotch broom from the lakeshore, and 3) allowing natural growth of willows and cattails along the shore.

Mitigation Measure Bio3. To minimize shoreline disturbance and wildlife harassment at Tubb Lake by people and pets, the project sponsor, in coordination with the City, shall provide paved or decomposed granite paths and signs around Tubb Lake prior to occupancy of any uses on the project site.

²² Preliminary Tree Removal Plan, 2000 Larkspur Landing Circle, Land Development Solutions, Inc., April 21, 2004.

Mitigation Measure Bio4. The project sponsor shall replace heritage trees removed at a ratio of 2:1 (planted: removed) for removed trees greater than 15 inches but less than 25 inches in diameter, and 4:1 for trees removed greater than 25 inches in diameter. The minimum number of replacement trees that shall be planted is estimated at 142. About 90 percent of the replacement trees should be located on the site, including the area proposed for park dedication. The remainder should be located on the City easement bordering the pedestrian trail outside the property boundary to provide a screen and wildlife corridor between this project and adjoining developments. Also, up to 10 willows and bays could be planted at Tubb Lake, where a limited amount of suitable space is available.

Trees to be planted shall range in size from 5-gallon to 24-inch box. Up to 20 percent shall be 24-inch box, with the remainder to be a reasonable variety of sizes, with no more than 15 percent in 5-gallon cans. Trees shall be obtained from a reputable native plant nursery.

Trees shall be caged and watered through at least the first two dry seasons. A seven-year monitoring plan shall be developed by the project sponsor and approved by the City; the monitoring plan shall include, but not be limited to, the following features:

- Detailed drawings and specifications defining locations of trees, showing caging installations, and showing irrigation systems.
- Monthly inspections by a qualified arborist to ensure that cages and irrigation equipment remain in place and functioning until the arborist determines that they are no longer required.
- A written plan for removal of irrigation equipment when the arborist determines that removal is appropriate.
- Quarterly inspections by a qualified arborist during the remaining years of the monitoring period, after irrigation equipment is removed.
- Replanting diseased or damaged trees as necessary to meet the goal identified below.

The trees' survival shall be recorded annually and reported to the City for seven years. At the end of seven years, the goal shall be to have at least 2 trees surviving for each tree removed. The project sponsor shall post a bond or provide other financial assurance in a form approved by the City for payment of this planting and monitoring work or pay the City in advance if the City assumes responsibility for the work.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in ' 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to ' 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a) The project site contains no significant historic architectural resources. The existing structures on the site include two temporary trailer office structures; three small, one-story equipment storage and maintenance sheds; two fuel dispensers and above-ground storage tanks; a pump house for the force main carrying sewage to the Central Marin wastewater treatment plant; and a parking lot for District employees. The rest of the site is vacant, predominantly unpaved land. None of the permanent structures exhibit important architectural styles and none is of sufficient age (normally 50 years) to be considered for historic designation. Therefore, removal of these on-site structures would not constitute a substantial adverse change in the significance of an historic resource under CEQA.

The Remillard Cottage immediately north of the project site was built in the 1890s and is listed on the Larkspur Historic Resources Inventory.²³ It is presently occupied by a daycare center. This building is a one-story hip-roofed Victorian stick style building with wood shiplap siding and large double-hung windows. There is a covered veranda across the front with carved columns and a plain railing.

²³ The Historic Resources Inventory was adopted by the Larkspur City Council as part of a historic preservation program in 1978. The *Larkspur General Plan 1990-2010* replaced the 1978 Heritage Preservation Element with a Historic Resources section in Chapter 3, Community Character (see pp. 48-54). Action Program 7 in Chapter 3 requires the City to “maintain an up-to-date inventory of existing historic resources, including artifacts, structures, sites, areas, and natural phenomena.”

The Remillard Brick Kiln building, constructed in 1891, is to the southeast of the site. In 1978 the building, identified as the Green Brae Brick Kiln of the Remillard Brick Company, was designated California Landmark Number 917 and listed on the California Register of Historical Resources because it is a State Landmark. It was also listed on the National Register of Historic Places. It is particularly important in the area of historic engineering because it is one of the last surviving examples of the Hoffman-type kiln in the United States. In 1988 a new wood-frame building was constructed on top of and incorporating parts of the historic kiln. This new construction, which occurred after landmark designation, compromised the historic integrity of the property.²⁴ The three-story modern structure includes a modern, plexiglass railing on the front of the original brick structure and an attached metal stair on the rear. The original “wickets” or arched openings leading into the kiln have been filled in with modern glazing. The new building extends east of the brick kiln structure and dwarfs the historic structure, making it difficult to differentiate the historic elements of the brick kiln complex, except for the tall, octagonal chimney stack. The chimney appears relatively uncompromised and retains its corbelled cap and a sign that reads “RB Co., 1891.”

The project would not demolish any historic architectural resources; therefore, no direct significant environmental impact would result from the proposed project. Views of the Brick Kiln building would be changed as a result of the proposed project. Two of the residential buildings proposed to be constructed on the project site along East Sir Francis Drake Boulevard would temporarily block views of the Remillard Brick Kiln building and the historic smokestack for motorists traveling eastbound along East Sir Francis Drake Boulevard for a few seconds and for pedestrians walking along the adjacent pedestrian pathway for a few minutes. Because the Remillard Brick Kiln has lost much of its historic integrity, and because views of the building would only be obstructed by the proposed project for short periods of time, view obstruction would not be considered significant. (See I. Aesthetics, above, for a discussion of the visual impacts of view blockage.) Views of the Remillard Cottage building would not be substantially changed. Overall, the project would not have a substantial adverse impact on neighboring historic resources.

- b-d) There are known pre-historic and historic archaeological materials in the southern portion of the project site, extending from East Sir Francis Drake Boulevard to the center of the site. The prehistoric archaeological site, designated CA-MRN-255/H, is partly on the project site, with the

²⁴ Carey & Co., Inc., *Larkspur Landing EIR Historic Resource Evaluation and Impacts Analysis*, August 22, 2001, p. 2.

remainder located on the adjacent Remillard Brick Kiln property to the southeast.²⁵ Several archaeological investigations and tests have been carried out on MRN-255 for the Sanitary District No. 1. The extensive investigation documented in the reports prepared by archaeological consultant Holman & Associates in April and November 2000 provides sufficient information about the archaeological resources on the project site; no additional archaeological investigation is required.²⁶ These reports are summarized and incorporated by reference into the following discussion.

The prehistoric archaeological site CA-MRN-255 on the project site and Brick Kiln property was probably originally adjacent to wetlands that existed on the San Francisco Bay shore, before dredging, filling, and erosion in the past 200 years dramatically changed the Bay shoreline and the location and amount of wetlands. The site in prehistoric times would have included oak woodlands, grasslands, marsh and mudflats and would have provided sources of food and materials for prehistoric residents both from the Bay and wetlands, and from the nearby hills and oak woodlands. A Native American shell midden was identified on the site in 1955. Other archaeological investigations conducted during the 1970's and 1980's showed an intact Native American midden to a depth of at least three feet on the southern portion of the project site. Archaeological investigations conducted by Holman & Associates in 1998 through 2000 for Sanitary District No. 1 found remnants of an intact midden and a redeposited midden as well as the remains of three partial Native American burials, at depths to about six feet on the project site.

The three Native American burials recovered were all highly fragmented and incomplete. No artifacts were associated with any of the burials. Additional non-associated bone fragments found in several areas of the archaeological investigation indicate that there were probably additional burials on the site that were disturbed during prehistoric and/or historic periods. The recovered burials were treated as required by California Statute, including consultation with the County Coroner and the Native American Heritage Commission.

Subsurface investigations also indicated the likely presence of a small streamlet or bay inlet in the southern portion of the project site that appears to have been historically filled to level this portion of the site for later uses. The fill material appears to be from the redeposited shell

²⁵ No maps are provided of likely archaeological sites, and precise locations are not described in the text, in order to protect the sites from unauthorized removals.

²⁶ Holman & Associates, Memorandum Re: *Proposal and Summary of Work to Date at 2000 Larkspur Landing Circle, Larkspur*, April 10, 2000, for Campus Cornerstone Larkspur, LLC (hereinafter "Holman & Associates, April 2000"). Holman & Associates, *Archaeological Investigations at CA-MRN-255/H Larkspur, Marin County, California*, November 2000, for Sanitary District No. 1 (hereinafter "Holman & Associates, November 2000").

midden. A small area of an older intact midden was found near the southeast corner of the project site to the west of the Brick Kiln building; this midden lies mainly below the existing water table.

Prehistoric artifacts recovered from the project site included obsidian projectile points, charmstones, fragments of mortars and pestles, and bird and mammal bones. Extensive testing and investigation of recovered artifacts suggests that the area was occupied for a period of up to 800 years about 1,900 to 2,300 years ago, ending about 1,500 years ago. The “fishtail” charmstones found at the site help to identify the period when the site was probably inhabited. According to Holman & Associates, “the presence of several Native American burials, a number of seed grinding implements, and dense layers of dietary refuse support the conclusion that the site was occupied by family units for much of the year.”²⁷ The pre-historic inhabitants are estimated to have been members of the Coast Miwok culture, possibly from the Huiman triblet who are known to have lived on Richardson Bay and Corte Madera Creek. Coast Miwok inhabitants followed a subsistence cycle geared towards pursuit of seasonally available resources like acorns, salmon, shellfish, and migratory birds, similar to resources that would have been available on the project site and in nearby wetlands at the Bay shore. The project site also probably provided year-round sources of food such as deer and other game. The inhabitants probably traded with other tribes to the north, based on the number of obsidian tools found at the site.

The November 2000 Holman & Associates archaeological report concluded that although a significant portion of the prehistoric and historic archaeological deposits were excavated to mitigate the impacts caused by the construction and subsequent dismantling of the wastewater treatment plant formerly on the site, intact archaeological deposits and concentrations of redeposited materials are still present on the project site. Specifically, the southern portion of the site is an area with known prehistoric Native American and historic archaeological deposits, including undisturbed remnants of midden. The archaeological consultant has suggested that these prehistoric deposits may be eligible for the California Register of Historic Places as an historical resource.²⁸ Accordingly, it was recommended that future development on this site should be done in consultation with a qualified archaeologist prior to conducting any earth-moving construction activities (see Mitigation Measures Cul1 and Cul2).²⁹

²⁷ Holman & Associates, November 2000, p. 13.5.

²⁸ Holman & Associates, November 2000, pp. 1.2-1.4.

²⁹ Holman & Associates, November 2000, p. 13.5.

Near the end of the Spanish/Mexican Period (1776 to 1846) in about 1840, the area extending from Point San Quentin, east of the project site, to Ross Valley west of the project site, was used for cattle raising and timber harvesting. In 1852, the State Legislature chose the San Quentin peninsula for a permanent state prison facility. The area north and west of San Quentin State Prison, east of the project site, was used for brick making beginning in the 1850's.³⁰ By the late 1860's the Remillard Brick Company was operating a brickyard in the vicinity of the project site. In 1889, the Remillards bought 150 acres of land adjacent to their brickyard, which included the project site. Bricks were transported to San Francisco by the company's scow schooners from a wharf at nearby Larkspur Landing. In 1891 the Remillards constructed the county's first Hoffman kiln. This building, the Remillard Brick Kiln, still stands adjacent to the southern and eastern boundary of the project site. It is designated California Landmark Number 917 and is listed on the National Register of Historic Places. The interior of the kiln has been converted to a restaurant, and the kiln incorporated into a contemporary building used for offices. Tubb Lake, northeast of the project site, was probably also created in the 1890's as a water supply for employees who lived at the site and for brick-making activities. The Remillard brickyard included support structures including a cookhouse, 16 cabins for workers, stables, a blacksmith shop, vegetable gardens and an orchard. The Remillard Brick Company ceased operations in 1915.

It is likely that some of the buildings at the Remillard Brick Company, including beehive kilns and cabins, were on the project site.³¹ None of those buildings remain on the project site. They were probably demolished after 1945 for the construction of industrial structures (related to producing shingles and wood fencing materials) and the wastewater treatment plant. However, brick layers, decomposing brick layers, and a brick-lined well were encountered during subsurface investigations on the project site prior to demolition of the wastewater treatment plant. These historic remains suggest that there could have been a kiln on the project site.

In the late 1940's, the von der Werth Redwood Products business was established on the southern portion of the project site, producing shake shingles in a small mill. The von der Werths changed to producing wood fencing materials during the early 1950's, and remained on the site until the early 1960's. None of the von der Werth structures remain on the project site.

³⁰ Holman & Associates, November 2000, Chapter 5, discusses historic uses on the project site and in the surrounding area.

³¹ National Register of Historic Places Inventory – Nomination Form for Remillard Brick Kiln, April 18, 1977.

The wastewater treatment plant was constructed in the late 1940's on the remainder of the project site. The treatment plant was expanded in the 1960's and again in the 1970's. It was closed in 1985 when the Central Marin Sanitation Agency constructed a new wastewater treatment plant on the north side of Point San Quentin. The treatment plant facilities on the project site were demolished in 1999 and 2000, except for the Sanitary District No. 1 buildings previously described that currently exist on the site.

The current project proposes removal of the existing District No. 1 facilities and construction of a mixed-use project, including a business hotel, 16 residential buildings and new facilities for Sanitary District No. 1 as well as accessory parking for all the proposed uses. The hotel, Sanitary District facilities and six of the residential buildings—two Auto Court Design 1 buildings, two Live/Work Row Townhouse buildings, and two Green Court buildings—would be located on portions of the project site that have been determined by archaeologists for Sanitary District No. 1 to have limited or no likelihood of subsurface archaeological artifacts.³² The western portion of the site adjacent to Larkspur Landing Circle East is also not expected to include archaeological materials; therefore, the four Live/Work Row Townhouse buildings and one Green Court building proposed on the western portion of the site would not be expected to impact archaeological resources. The remainder of the site, proposed to be the site for five of the residential buildings, is an area with known prehistoric Native American and historic archaeological deposits.

Extensive cutting and filling of the project site would be required in order to construct the proposed mixed-use development. The project sponsor proposes to implement a grading plan involving cutting about 25,000 cu. yd. of soil and rock from certain steeply inclined site areas to the north, and the placement of about 50,000 cu. yd. of fill to raise the level of lower site areas. Since cutting would occur in project areas determined by archaeologists to have limited or no likelihood of subsurface archaeological artifacts and filling would occur on the portions of the project site known to contain prehistoric Native American remains and historic archaeological deposits, the proposed grading plan is not expected to disturb these subsurface prehistoric/historic archaeological deposits.

Specific recommendations regarding building foundations will be addressed in a final geotechnical investigation for the proposed project. Given the scale of the five residential buildings proposed in the project area with known archaeological deposits, it is likely that they

³² Holman & Associates, April 2000, p. 7.

would be supported by either mat foundations or shallow spread footings founded on compacted fill. However, the use of the drilled pier foundations for these buildings cannot be ruled out. Drilling foundation pier holes could disturb the redeposited Native American shell midden known to be located in the southern portion of the project site, and could also disturb historic archaeological artifacts from the brick-making uses on the site in the late 1800's. This would be considered a significant impact on archaeological resources without implementation of Mitigation Measure Cul1. Future development on the project site, including excavation and foundation construction, in the area where important archaeological resources may occur would also be carried out in consultation with a qualified archaeologist, as described in Mitigation Measure Cul2, below. In the event of discovery of previously undocumented archeological resources, the project would implement these measures in conformity with Larkspur Municipal Code Section 15.42.030 (c) which governs discovery of archeological resources (see Mitigation Measures Cul2, below). With implementation of Mitigation Measures Cul1 and Cul2, impacts to Native American or historic archaeological resources due to subsurface excavation, ground disturbance, or the use of the drilled pier foundations would be less than significant.

Overall, the project would have a less-than-significant impact on archaeological resources or other cultural resources.

Mitigation Measures

Mitigation Measure Cul1. The following steps shall be implemented during drilling for foundation piers (if the foundation type is used) in the area where important archaeological resources may occur:

- ❖ An experienced archaeologist shall be present for continuous monitoring of removal of drilled soils, including observation of soils in their stratigraphic layers as they are removed. The archaeological monitor shall be permitted to take appropriate samples as warranted.
- ❖ The archaeologist shall be authorized to stop or redirect project activity until an evaluation of the presence and integrity of any identified resource can be made.
- ❖ If it is determined that the archaeological resources are potentially significant, the archaeologist shall be authorized to undertake appropriate measures, including further evaluation and data recovery of artifacts in removed soils.
- ❖ Immediately following drilling of each pier hole, all artifacts removed must be appropriately catalogued. During and/or following on-site monitoring, all artifacts removed must be analyzed and, if appropriate, curated in a suitable repository.

- ◊ If human remains are encountered during drilling activities, drilling at that location shall stop and the Marin County Coroner shall be notified (as required by California Health and Safety Code Section 7050.5). In the event that the human remains are believed to be those of a Native American, the Most Likely Descendent will be identified, who will formulate an appropriate treatment plan in consultation with the archaeologist (as required by California Public Resources Code Section 5097.98). An appropriate treatment plan is expected to include removal of the remains with scientific recording and study, and timely return of the remains to the Most Likely Descendent for final reinterment.
- ◊ A final report shall be prepared describing methods used, results and findings of the archaeological monitoring and mitigation program. Copies of the final report shall be provided to the City of Larkspur and the California Archaeological Site Survey Northwest Information Center.

Mitigation Measure Cul2. An experienced archaeologist shall be present for all earthmoving activities, excavation, and foundation placement below the level of the ground surface existing as of July 2000 within Area 2³³ on the project site to provide continuous monitoring of removal of soils, including observation of soils in their stratigraphic layers as they are removed. The archaeologist shall be permitted to take appropriate samples as warranted. If resources are encountered, the steps outlined in Mitigation Measure Cul1, shall be followed, substituting “excavation and grading” for “drilling” where appropriate.

VI. GEOLOGY AND SOILS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
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, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

³³ As shown on Figure 2: Area of Archaeological Concern at the Marin Sanitary District No. 1 Treatment Plant Property, in the Holman & Associates April 10, 2000 Memorandum titled *Proposal and Summary of Work to Date at 2000 Larkspur Landing Circle, Larkspur*, p. 12.

iv) Landslides?

VI. GEOLOGY AND SOILS (cont'd.)	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) The project site is at the mouth of a small, northeast-trending valley located at the eastern end of the City of Larkspur in the Central Coast Ranges geomorphic province, which is characterized by northwest-southeast trending valleys and ridges. The regional bedrock geology underlying most of this terrain consists of folded, faulted, sheared, and altered sedimentary, igneous, and metamorphic rock of the Jurassic-Cretaceous age Franciscan Complex. Most of the site is a nearly level area, sloping gently to the south as a result of grading after demolition of the wastewater treatment plant. Flanking the level area to the northwest, north and northeast are hillslopes that have been steepened as a result of quarrying operations prior to 1948. The slopes are generally inclined 1:1 (horizontal to vertical), or 45 degrees, with a portion of the slope to the northwest inclined at a steeper 50 degrees. The slope east of the site continues to the east above Tubb Lake. The upper portion of this slope is natural, and contains several natural drainage swales. The embankment retaining Tubb Lake is situated beyond the north boundary of the site. The embankment was constructed about 100 years ago. North of the site above the northwest, north and northeast sides of Tubb Lake, there are steep cut slopes. As with the project site slopes, these slopes behind Tubb Lake were also steepened as a result of the pre-1948 quarrying operations.

- i) The site is located in the seismically active San Francisco Bay Area region. No active faults that could expose people or structures to hazards associated with fault rupture were identified on-site or in the project vicinity by the Alquist-Priolo Earthquake Faulting Zoning Map issued by the California Division of Mines and Geology in 1992. Therefore, there would be no project impacts related to rupture of a known earthquake fault as delineated by the State Geologist or other substantial evidence of a known fault.
- ii) Although there are no active faults on-site, the proposed project site is located near several active faults and is in an area subject to strong groundshaking from earthquakes along the active San Andreas and Hayward faults. The *Larkspur General Plan* identifies the project site and surrounding areas as a high seismic hazard area. Therefore, there is a possibility that the site may experience groundshaking from periodic minor earthquakes and possibly a major earthquake. Modern seismic design criteria for resistance to the lateral forces of groundshaking, and other requirements of the California Building Code as adopted by the City of Larkspur, would substantially reduce the potential for structural failure, major structural damage, and loss of life from earthquake-induced ground shaking. The City of Larkspur requires that a design-level geotechnical engineering investigation be prepared for the proposed project and submitted to the City Building Department prior to issuance of any permits, and that the project sponsor follow the recommendations contained in the investigation. Compliance with the California Building Code and the recommendations in the geotechnical investigation would reduce the primary effects of ground shaking on structures and infrastructure to a less-than-significant level.
- iii) The ground shaking accompanying major earthquakes has primary and secondary effects. Primary effects of ground shaking are those that directly affect buildings and other structures. Secondary effects of ground shaking can cause various types of soil movements, such as landslides, settlement, and liquefaction. Liquefaction is a response to severe ground shaking that can occur in loose, uniform soils that are saturated with water. The site does not contain the types of loose, saturated soils typically associated with liquefaction.³⁴ Based on the relatively dense nature of the soils and the project site and the underlying geology, the potential for liquefaction or seismically induced failure

³⁴ Treadwell & Rollo, Inc., 2000, Preliminary Geotechnical Investigation, Proposed Hotel and Office Buildings, 2000 Larkspur Landing Circle, Larkspur, California, March 30, 2000 (hereinafter “Treadwell & Rollo, 2000”), p. 15.

on the site is considered low, and therefore, this would be considered a less-than-significant impact with project development.

- iv) The topography of the project site and its immediate vicinity has been altered from its natural state from previous quarrying operations, and currently contains many slopes of various inclinations and types. Landslides, the presence of undocumented fill, and colluvium have been mapped within the slopes above the project site; for instance, several relatively small landslide deposits have been mapped in swales upslope of the project site. No features indicative of deep-seated landslide movements have been noted on the site nor immediately upslope of the site.³⁵ The 12 identified areas of landslide deposits are of various widths (25 feet to 100 feet) and are of unknown depths. Some are associated with the former quarry activities. The project site and upslope areas to the north are mapped in Zone 2 (flat to gentle slopes – stable) and Zone 3 (moderate slopes – moderate stability) in the *Larkspur General Plan*. The potential impact of landslides would be mitigated (see Mitigation Measure Geo1, below).

The potential for seismically-induced landslides in the slopes above the project site is a concern. Although there are no identified deep-seated slide areas on or above the project site, there is a potential for seismically-induced landslides in the slopes above the project site as the small landslide deposits located upslope of the site could provide a source for materials that could shake loose and fall on buildings or other improvements on the project site below. Therefore, the major potential effects of the proposed project on the geologic environment relate to instability of new cut and fill slopes, the potential for seismically-induced landslides and the attraction of additional population to a potentially hazardous area. The mitigation discussed below (Measure Geo1) would reduce this impact to less-than-significant levels.

- b) The natural soils of the site have been substantially altered by previous use of the site: construction of the Tubb Lake embankment sometime prior to 1899; quarrying prior to 1948; and grading and placement of fill for the creation of the former Sanitary District No. 1 Treatment Plant in 1948. Further modification occurred when the Treatment Plant was demolished and the site graded in 1998. The remaining native soil is on the slopes at the northern and eastern edges of the property. The proposed development would require removal of much of the remaining topsoil during the construction phase of the project. However, this removal would not be significant as these areas total less than 1.4 acres in extent and the soils are not uniquely valuable.

³⁵ *Ibid.*

The proposed project would not create any new drainage patterns on the undeveloped portions of the property, i.e. no new pathways for soil erosion. On the developed portions of the property, drainage would be contained in engineered drainage structures. Thus, soil erosion would not occur and the loss of topsoil would be considered a less-than-significant impact.

- c) The soils on the project site and in the watershed above the site are made up of artificial fill and surface soils, underlain by bedrock. Surface soils consist of deposits of colluvium (loose deposits of soil, organic material, and weathered bedrock fragments accumulated by gravity on hillsides) and other soils. The colluvium deposits are located primarily in the swales on the slopes east and north of the site and above Tubb Lake. Colluvial soils may also be buried under the fill. The non-colluvial soils consist of stiff to hard gravelly and sandy clays. In the southern portion of the site, a layer of Bay Mud up to 18 ft. thick is found between surface soils and the sandstone bedrock. Bay Mud is a highly compressible, weak silty clay/clayey silt present beneath and along most of the shoreline of San Francisco Bay. The type of soil most susceptible to liquefaction is loose, clean, saturated, uniformly graded, fine-grained sand. The soil below groundwater at the site is dense or contains significant clay fractions and, therefore, the risk for liquefaction is low.³⁶ The potential impact of unstable soils would be mitigated (see Mitigation Measure Geo1, below).

Fill is the most prevalent soil type. Fill was placed for the construction of the Tubb Lake embankment, when the former Sanitary District No. 1 Treatment Plant was constructed on the site of the quarry, and again when the Treatment Plant was demolished in 1998. Fill thickness on the site ranges from a few inches at the edges of the flat, central portion of the site, to 14 feet where cavities resulting from demolition of below-grade structures and pits were backfilled.

Extensive cutting and filling of the site soils would occur in order to construct the proposed roads and buildings on the site. Twenty-five thousand cubic yards (cu. yd.) of soil and rock would be cut and 50,000 cu. yd of fill would be placed, requiring the importation of 25,000 cu. yd. of soil. In order to safely construct roads and buildings, the fill must be compacted in accordance with the California Building Code. Compliance with Building Code requirements, particularly regarding the placement and compaction of fill would protect against lateral spreading, subsidence, liquefaction or collapse of the fill, thus avoiding significant impacts due to unstable soil on the project site.

Several landslide deposits have been mapped in swales upslope of the site (around Tubb Lake). These areas could pose landslide hazards to the proposed development. Possible hazards are:

³⁶ *Op cit* Treadwell & Rollo, 2000.

- Debris flows on fill slopes and colluvium-filled swales upslope of the site; in particular, the former quarry fill slope northwest of the site, and
- Sedimentation in drainage systems from upslope erosion and slope failures.

Mitigation of these hazards would be included in the recommendations contained in the Final Geotechnical Investigation Report required for the proposed project (see Mitigation Measure Geo1, below). These recommendations could include features such as catchment basins at the mouths of the drainage courses and repair of slopes. With this mitigation, the possible impact of landslides on the project would become less than significant.

- d) Soils now present on the project site are not expansive. As fill is imported to raise the site, it is possible that expansive soil materials could be deposited on the site. The geotechnical engineer would specify that non-expansive imported fill be used to raise the site.³⁷ Thus, impacts caused by expansive soils would not occur.
- e) Sewers are available for the disposal of wastewater generated by the proposed project. Septic tanks or alternative waste water disposal systems would not be required or employed. Therefore the project would have no impacts related to the suitability of soils for septic tanks or alternative waste water disposal systems.

Mitigation Measure

Mitigation Measure Geo1. The project sponsor shall prepare and submit to the City for review a Final Geotechnical Investigation Report for the proposed project buildings prior to or at the same time as building plans are submitted for building permits (*Larkspur General Plan*, Chapter 7, Community Health and Safety, Policy 1, Action Program [25] and [26](b)) and shall demonstrate compliance with all findings and recommendations in the Treadwell and Rollo preliminary geotechnical reports dated March 29, 1999, March 30, 2000, and October 9, 2003, unless these recommendations are expressly superseded in the Final Geotechnical Investigation Report.

VII. HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

³⁷ Hadi Yap, Ph.D., Geotechnical Engineer, Treadwell & Rollo, personal communication with Turnstone Consulting, September 20, 2004.

disposal of hazardous materials?

VII. HAZARDS AND HAZARDOUS MATERIALS (cont'd.)	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a-b) No hazardous materials except the types routinely used in construction and in the use and occupancy of offices, hotels and residences would be present on the site. The land uses proposed for the project typically use minor amounts of hazardous materials for cleaning and maintenance. Most households contain hazardous materials such as bleach, cleaning products, adhesives, and

pesticides. Cleaning chemicals and chlorine used to disinfect swimming pools may be stored and used on the hotel site; this use of chemicals would be typical of many homes and hotels in Marin County. Fuel and chemicals that may be used by Sanitary District No. 1 would be the same as those now used on the site and would not create new or unusual hazardous conditions when the District's normal safe-handling practices are followed. Landscape maintenance could include the use of hazardous pesticides or herbicides. Because this use could impact sensitive biological habitats in Corte Madera Creek and the Bay from storm water runoff, the Biological Resources section contains Mitigation Measure Bio1 to implement a native species landscaping program, reducing the need for pesticides and herbicides. In addition, the Hydrology and Water Quality section contains Mitigation Measure WQ2 that includes the use of a bioswale to collect and provide treatment of some storm water runoff. Thus, the project would not create a significant hazard through the use, release or disposal of hazardous materials.

- c) There is no existing or proposed school within one-quarter mile of the project site. The Remillard Cottage Children's Daycare Center is located approximately 100 feet north of the proposed project. The type and quantities of hazardous materials present on the site would be the same as are now present at the Sanitary District facility and in existing neighboring residences. Thus, there would be no substantial change in the types of hazardous materials handled on the project site by the Sanitary District, and no impact from hazardous emissions, or from handling hazardous materials, substances or waste.
- d) The proposed site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The project site was previously used as a quarry and as a wastewater treatment plant. Studies conducted between 1996 and 1999 indicated the presence of elevated concentrations of arsenic, cadmium, chromium, nickel and polychlorinated biphenyls (PCBs) in soil on the site.³⁸ Concentrations of certain metals and PCBs exceed their respective Environmental Screening Levels (ESLs) for residential use established by the Regional Water Quality Control Board. However, the concentrations of metals detected in the soil are generally consistent with typical background concentrations in soils in Marin County. Soils containing the elevated concentrations of metals and PCBs are currently located at depths ranging from approximately 4 to 16 feet below the current site ground surface.

Under the development proposal, additional fill would be imported to the flat portions of the site.

³⁸ Erler & Kalinowski, Inc., letter to Michael Hooper, Campus Properties, LLC, Preliminary Environmental Review of 2000 Larkspur Landing Circle, April 5, 1999, and Erler & Kalinowski, Inc., letter to Michael Hooper, Campus St. James Larkspur, LLC, Review of Available Soil Data for 2000 Larkspur Landing Circle, Larkspur, California, October 16, 2003.

The project sponsor proposes to place approximately three to five feet of fill on the area where elevated concentrations of metals and PCBs are located. Thus, if the existing soils are left in place and not disturbed, the chemicals in the soil would ultimately be covered by from 7 to 21 feet of clean fill, and would not present an unacceptable human health risk to future site occupants.³⁹ Mitigation Measure Haz2 requires that fill to be imported be tested prior to placement and be found to be free of contaminants. Impacts of contaminated soils would be less than significant with implementation of Mitigation Measures Haz1 and Haz2, below.

In 2004, additional studies were conducted to examine the fill imported to the site as part of demolition of the former wastewater treatment plant.⁴⁰ This investigation found that arsenic, chromium, diesel petroleum hydrocarbons, motor oil hydrocarbons, and PCBs were present in concentrations exceeding the residential ESLs. The concentrations of metals detected in the soil continued to be generally consistent with typical background concentrations in soils in Marin County. The 2004 investigation recommended that soils containing concentrations of diesel and motor oil hydrocarbons and PCBs exceeding the ESLs be removed from the site.⁴¹ This recommendation has been included in the project as Mitigation Measure Haz1, below.

- e-f) The project is not located within an airport land use plan or within two miles of a public airport or public use airport. The project is not within the vicinity of a private airstrip. Thus, the project would not result in a safety hazard for people residing or working in the project area.
- g) The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project Spine and Spur Roads provide access for emergency vehicles to all parts of the project site, as well as a secondary access to and from the adjacent Monahan Pacific development. Mitigation Measure Haz3, summarized below, would require provision of fire suppression systems such as sprinklering of buildings within the proposed development. As a result of implementing this mitigation measure, potential health and safety issues related to fire hazards at the project site would be reduced to less-than-significant levels.
- h) The Sanitary District No. 1 offices and the hotel would be near residential buildings on Lincoln Village Circle and would be served by emergency services from that local street. The project would include 30 residential units adjacent to undeveloped grassland and oak woodland. While

³⁹ *Ibid*

⁴⁰ Questa Engineering Corporation, Phase II Soil Investigation of Imported Fill, prepared for Ross Valley Sanitary District, June 30, 2004.

⁴¹ Questa Engineering Corporation, June 30, 2004, p. 13 and Figure 2.

these units would be constructed adjacent to undeveloped land, there is no reason to believe that the project would experience any significant impact from wildland fires different from the residences further north along Lincoln Village Circle. The proposed residences would not be mixed with wildland, but would extend the developed area of the City of Larkspur. Implementation of Mitigation Measure Haz4, summarized below, would further reduce the possibility of the project experiencing significant impacts from catastrophic fires at an urban/wildland interface.

Mitigation Measures

Mitigation Measure Haz1. The project sponsor shall not begin construction until after the remediation proposed in the *Phase II Soil Investigation of Import Fill, Former Waste Water Treatment Plant Site, 2000 Larkspur Landing Circle, Larkspur, California*, prepared by Questa Engineering Corporation, dated June 2004, has been completed.

Mitigation Measure Haz2. The project sponsor shall provide certification to the City prior to issuance of grading permits associated with placement of imported fill, that the imported fill has been tested and found to contain no California Code of Regulations Title 17 hazardous substances in concentrations exceeding San Francisco Bay RWQCB Environmental Screening Levels, or US Environmental Protection Agency, Region IX Preliminary Remediation Goals for residential sites.

Mitigation Measure Haz3. To protect against potential fire hazards within the proposed development, the project sponsor shall prepare, for City review and approval, and implement a project design that includes fire suppression systems such as sprinklering of buildings proposed on the project site.

Mitigation Measure Haz4. To reduce the possibility of catastrophic fires at an urban/wildland interface, the project sponsor shall prepare a landscape design that provides appropriately defensible space around each structure, for review and approval by appropriate City staff. The design shall avoid all potentially combustible landscaping, such as Scotch broom or Eucalyptus species, within 30 feet of structures, and shall avoid planting pine or Eucalyptus species in locations that could result in deposition of needles or leaves on building roofs. The project sponsor shall prepare a maintenance program to remove all dead vegetation from landscaped areas; the homeowner's association shall be required to implement the maintenance program, and a requirement to perform regular maintenance of landscaped areas shall be included in the Covenants, Conditions and Restrictions.

VIII. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a, f) It is possible that construction activities and post-construction site uses proposed by the project could result in degradation of water quality in San Francisco Bay by reducing the quality of storm water runoff. The project does not propose any discharges to receiving waters other than discharges associated with storm water runoff.

Construction Period Impacts. Construction and grading within the project site would require temporary disturbance of surface soils and removal of vegetative cover. During the construction period, grading and excavation activities would result in exposure of soil to runoff, potentially causing erosion and entrainment of sediment in the runoff. Soil stockpiles and excavated parcels on the project site would be exposed to runoff and, if not managed properly, the runoff could cause erosion and increased sedimentation in downstream culverts and the Bay. The accumulation of sediment could result in blockage of flows, potentially resulting in increased localized ponding or flooding.

The potential for chemical releases is present at most construction sites. Once released, substances such as fuels, oils, paints, and solvents could be transported to nearby surface waters in storm water runoff, wash water, and dust control water, potentially reducing the quality of the receiving waters. Mitigation Measure WQ1, summarized below, would be required to address the potential for discharge of sediment and other pollutants during the construction phase of the project.

Operation Period Impacts. New construction and intensified land uses at the project site would result in increased vehicle use and potential discharge of associated pollutants. Leaks of fuel or lubricants, tire wear, and fallout from exhaust contribute petroleum hydrocarbons, heavy metals, and sediment to the pollutant load in runoff being transported to receiving waters. Runoff from the proposed common landscaped areas and the parks may contain residual pesticides and nutrients. Long-term degradation of water quality runoff from the site could impact water quality in the Bay.

The project site drains through a single discharge pipe under East Sir Francis Drake Boulevard directly into the Bay, a water body that is listed as impaired by the Regional Water Quality Control Board (RWQCB). The RWQCB has designated San Francisco Bay as water quality

impaired for several pesticides (chlordane, DDT, diazinon, and dieldrin), dioxin compounds, furan compounds, mercury, nickel, PCBs, and selenium.⁴² If there is a chance that the project could increase the load of any of these pollutants discharged to the Bay, then a significant cumulative impact would be expected to occur (the RWQCB has determined that the assimilative capacity of the Bay for these pollutants has already been exceeded).

Most of the contaminants that have been identified as causing the water quality impairment of the Bay are unlikely to be used at the site. Each of the pesticides (chlordane, DDT, diazinon, and dieldrin) has been banned and is therefore not available for legal use at the project site. The source of the dioxin and furan compounds has been identified as atmospheric deposition. The proposed project would not alter the rate of atmospheric deposition, and therefore not change the current loading rate of these compounds (the rate may be decreased due to the proposed treatment Best Management Practices). PCBs and mercury would not be used at the site and discharges of these contaminants would not be expected to be affected by the project. The selenium impairment has been caused by industrial point sources, agriculture, and natural sources. None of these uses are proposed for the project site.

Nickel in storm water runoff is mostly associated with suspended solids and organic matter. Sources of nickel include corrosion of welded metal plating, wear of moving parts in engines, electroplating and alloy manufacture, and food production equipment.⁴³ It is possible that increased vehicle traffic at the project site could increase the nickel load in storm water. However, the site is occasionally used for overflow ferry parking for San Francisco Giants baseball games and therefore, the existing condition includes substantial vehicular use. Further, the existing condition does not include treatment of all runoff from the site prior to discharge. Since nickel is almost always associated with suspended solids, and the project proposes treatment technologies to remove suspended solids (where none exist now), it is likely that the nickel load in runoff leaving the site would be decreased under the proposed project.

In summary, the proposed project is not expected to affect the loading of any of the pollutants that are currently causing impairment in the Bay. However, without appropriate mitigation, the project could result in unacceptable discharges of sediment and/or urban pollutants during construction and operation phases. Mitigation Measure WQ2, below, summarizes the storm

⁴² Regional Water Quality Control Board (RWQCB), San Francisco Bay Region, 2003, 2002 CWA Section 303(d) List of Water Quality Limited Segment, Approved by USEPA: July 2003.

⁴³ Makepeace, D.K., Smith, D.W. & Stanley, S.J. 1995, Urban Stormwater Quality: Summary of Contaminant Data, *Crit Rev Environ Sci Technol*, vol. 25, no. 2, pp. 93-139.

water runoff treatment requirements for the proposed project. Implementation of Mitigation Measure WQ2 would reduce this potentially significant impact to a less-than-significant level.

- b) The project site is not located in an identified groundwater basin.⁴⁴ The project does not propose the use of groundwater and therefore no long-term extraction of groundwater at the project site is expected. There may be short-term dewatering of shallow groundwater associated with the construction phase. Short-term dewatering activities would not be expected to have any significant long-term effect on groundwater resources because any pumping activities would be of limited duration. Therefore, the project would have a less-than-significant impact.
- c) No perennial streams or rivers cross the site. All storm-related surface runoff from the site is currently conveyed to the Bay through a 36-inch pipe that crosses under East Sir Francis Drake Boulevard. The central portion of the site (including the Sanitary District's parking lot) drains to a 12-inch underground pipe that discharges into the 36-inch pipe at the southern property boundary. The rest of the site drains toward a grassy swale along the site's southeast property boundary. This grassy swale eventually discharges to the 36-inch pipe under East Sir Francis Drake Boulevard. The site also receives through-flow from the watershed upstream. Approximately 20 acres of open space, which includes Tubb Lake, are located upslope and drain through the grassy swale along the southeast property boundary of the site.

The project proposes to alter the existing topography by grading, and therefore drainage patterns would be changed relative to existing conditions. The project proposes to convey all upstream off-site storm drainage that currently flows through the on-site grassy swale in an underground pipe directly to the East Sir Francis Drake culvert. On-site runoff would be directed either to a redesigned grassy swale (approximately 240 feet long adjacent to the existing Brick Kiln site) or to an in-line vortex-type treatment device.

The proposed project could result in increased erosion and deposition of sediment in the Bay during both the construction and operation periods of the project. However, Mitigation Measures WQ1 and WQ2, described under "a", above, would be expected to adequately mitigate the potential for increased erosion and siltation to a less-than-significant level.

- d) In many cases, when a proposed development would result in increased peak discharges of storm water, downstream creeks or rivers could experience increased flooding due to the increased discharge. In these situations, it is often required that new projects incorporate detention ponds to

⁴⁴ Regional Water Quality Control Board (RWQCB), San Francisco Bay Region, 1995, Water Quality Control Plan, June 21.

reduce the peak discharges to pre-development levels. The project site drains directly to the Bay, and therefore downstream flooding is controlled by the elevation of the water in the Bay. Minor changes in runoff rates and volumes from the project site would not be expected to result in any measurable change in the elevation of the water in the Bay. Therefore, increased peak discharge rates from the proposed project are considered a less-than-significant impact without mitigation.

- e) It is possible that increased discharges (associated with more impervious surfaces) under the proposed project could exceed the capacity of the 36-inch culvert under East Sir Francis Drake Boulevard. It is also possible that gradual sea level rise could raise the water level in the Bay to a level that would reduce the efficiency of the existing culvert under East Sir Francis Drake so that flooding may occur at the inlet (north of East Sir Francis Drake Boulevard).

Hydraulic modeling indicates that the existing 36-inch culvert is of adequate capacity to convey post-development peak discharges without localized flooding as long as all parking lot and building pad elevations are 6.4 feet above the National Geodetic Vertical Datum (NGVD). Similarly, the culvert was shown to adequately convey storm water from the site under a future scenario of a 1.7-foot increase in sea level (the 95 percent design confidence level projected to occur by the year 2050).⁴⁵

It was noted during a May 2004 site reconnaissance by BASELINE, and by Balance,⁴⁶ that the inlet structure for the 36-inch culvert is not in optimum condition for hydraulic efficiency. The hydrologic consultant for the applicant has recommended that the inlet structure for the culvert crossing East Sir Francis Drake Boulevard be improved as “an added level of design confidence.” This has been included in the project as Mitigation Measure WQ3. With implementation of this measure, this impact would be reduced to a less-than-significant level.

- g-h) According to the most recent FEMA mapping, the site is not located within the 100-year flood hazard zone, and therefore, no placement of housing or other structures in a flood hazard zone⁴⁷ would be expected to occur under the proposed project.
- i) The only dam or levee failure that would be expected to affect the proposed project would be the dam at Tubb Lake. Tubb Lake is located less than 100 feet upslope from the project site’s northeastern boundary. Reportedly, the lake was constructed about 100 years ago to provide

⁴⁵ Balance Hydrologics, 2001, *Hydrologic Opportunities and Constraints Analysis, 200 (sic) Larkspur Landing Circle, City of Larkspur, Marin County, California*, March 15.

⁴⁶ *Ibid.*

⁴⁷ Federal Emergency Management Agency, 1984, Flood Insurance Rate Map (FIRM), City of Larkspur, California, Community Panel Number 065040 0001 B, March 15.

water for a brick refractory formerly located nearby.⁴⁸ The reservoir embankment is about 20 to 25 feet higher than the downstream toe. The reservoir covers an area of about 0.5 acre, with a maximum depth of about 13 feet. When full, it is estimated that the reservoir holds about 3.8 acre-feet of water.⁴⁹

If the dam were to fail, it could flood the area downslope, potentially endangering people and property at the proposed project. The stability of the dam was investigated in the late 1990s and found to be in need of upgrades.⁵⁰⁻⁵¹ Since that time, the City of Larkspur has completed all the recommended upgrades and is implementing a maintenance plan that requires regular inspections and maintenance of the dam and its associated components. Potential damage to the proposed project from a dam failure is considered a less-than-significant impact.

- j) Seiching is the formation of standing waves in a water body due to wave formation and subsequent reflections from the ends. These waves may be incited by earthquake motions (similar to the motions caused by shaking a glass of water), impulsive winds over the surface, or due to wave motions entering the basin. It is possible that a seiche could develop in Tubb Lake, upslope from the project site. If a wave generated by a seiche were to overtop the dam at Tubb Lake, some flooding of the project site could occur. However, any seiche that is likely to occur in Tubb Lake would be relatively small because the lake is small (approximately 100 feet by 200 feet). The largest amplitude seiches are usually found in shallow bodies of water of large horizontal extent. A review of the literature revealed no accounts of historic damaging seiches occurring in lakes the size of Tubb Lake. Most notable seiches occur in large water bodies (e.g., the Great Lakes).⁵² Potential damage to the proposed project from a seiche is considered a less-than-significant impact.

The estimated run-up from a tsunami with a 100-year return period (i.e., expected to occur once every 100 years, on average) is 4.9 feet above mean sea level at the Bay / Corte Madera Creek estuary shoreline near the project site.⁵³ The elevation of the proposed project site is approximately ten feet above mean sea level or more. In addition, Mitigation Measure WQ3,

⁴⁸ Miller Pacific Engineering Group, 1997, Preliminary Geotechnical Evaluation, Tubb Lake, Larkspur, California, July 8.

⁴⁹ *Ibid.*

⁵⁰ *Ibid.*

⁵¹ Miller Pacific Engineering Group, 1999, Supplemental Geotechnical Evaluation, Tubb Lake Reservoir Embankment, Larkspur, California, August 26.

⁵² Great Lakes Environmental Research Lab, Sea Grant Lakes Network, 2004, website: <http://www.glerl.noaa.gov/seagrant/glw/photos/Seiche/SeicheHome.html>.

⁵³ Garcia A., Houston, J., 1975, Type 16 Flood Insurance Study: Tsunami Predictions for Monterey and San Francisco Bays and Puget Sound, Technical Report H-75-17, November.

described under “e”, requires that building pads for structures be at least 6.4 feet above NGVD. Given the surface elevation of the project site, inundation from a 100-year tsunami would not be expected.

The main central portion of the project site is relatively level and no impacts from mud flows would be expected in this area. However, mud flows or other types of slope failures could occur in the uplands surrounding the site to the north and east. Potential slope instability is further discussed in the Geology, Soils, and Seismicity section of this Initial Study.

Mitigation Measures

Mitigation Measure WQ1. The project sponsor shall prepare and implement a Construction Stormwater Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) to minimize the discharge of sediment and other pollutants during the construction phase of the project. The exact locations, extent, nature, and details of the BMPs shall be worked out in consultation with, and subject to review and approval of, the City of Larkspur prior to the issuance of grading permits. BMPs shall include but not be limited to:

- Project sponsor shall require that daily watering for dust control, soil stabilization controls, and perimeter silt fences be employed. Erosion control practices must be specified for the fill placement and compaction phase of the project. End-of-pipe sediment control measures (e.g., basins and traps) shall be used only as secondary measures. If, following the placement and compaction of fill, hydroseeding is selected as the primary soil stabilization method, then all areas shall be seeded by September 1 and irrigated as necessary to ensure that adequate root development has occurred prior to October 1.
- Project sponsor shall require that site drainage shall be prevented from contacting stored construction materials, equipment, and maintenance supplies (i.e., fuels, lubricants, paints, solvents, and adhesives), as well as waste construction materials and supplies, through the use of elevated platforms or berms or other diversion structures. Supply and waste storage areas shall be located at least 50 feet from drainage facilities and watercourses and shall not be located in any area prone to flooding.
- Project sponsor shall require that material and waste storage areas are protected from rainfall.
- Site supervisors shall conduct weekly on-site meetings to discuss pollution prevention. All construction personnel shall be required to attend such meetings.
- Project sponsor shall require that vehicle and equipment wash-down facilities be employed prior to exiting the site. These facilities shall be accessible and functional during both dry and wet conditions.

- The Construction SWPPP shall be maintained on-site and made available to Regional Water Quality Control Board staff upon request.

Mitigation Measure WQ2. The project sponsor shall prepare a Stormwater Management Plan (SWMP) specifying Best Management Practice to minimize impacts to surface water quality during the operational lifetime of the project. The sponsor shall incorporate as many concepts as practicable from *Start at the Source, Design Guidance Manual for Stormwater Quality Protection*. The exact locations, extent, nature, and details of the BMPs shall be worked out in consultation with, and subject to review and approval of, the City of Larkspur prior to the issuance of grading permits. Measures shall include but not be limited to:

- Weekly street sweeping;
- Implementing a Pesticide Management Program, including:
 - Properly identifying pests in order to select appropriate control
 - Avoiding injuring non-target species
 - Avoiding disposing of waste pesticides on site
 - Applying only the needed amount of pesticide
- Marking storm drain inlets “Drains to Bay”;
- Distributing pollution prevention educational materials to occupants of the completed project;
- Installing and maintaining a vegetated bioswale on the south and east sides of the site for storm drainage; and
- Using an in-line vortex device to remove debris, floatables, and sediment from storm drain flows not filtered through the bioswale.

The final design of project hydrologic features shall include measures designed to mitigate potential water quality degradation of runoff from all portions of the completed development. The SWMP shall describe how funding for long-term maintenance of the swale and vortex treatment device would be accomplished.

Mitigation Measure WQ3. All parking lot and building pad elevations shall be designed and constructed to be above 6.4 feet NGVD. In addition, the site drainage plan shall provide detailed plans for modification of the inlet structure to the 36-inch culvert crossing under East Sir Francis Drake Boulevard. The modified structure shall be designed to maximize the inlet efficiency and be designed and constructed in compliance with all requirements of the City of Larkspur Public Works Department.

IX. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) The site is owned by the Ross Valley Sanitary District of Marin County, and is under option to the project sponsor, Campus St. James, Larkspur, LLC. The Sanitary District No. 1 wastewater treatment plant, maintenance facility and administrative offices operated on the site from the 1940’s to the mid-1980’s. When the Central Marin Sanitation Agency wastewater treatment plant came on line in 1985, the treatment plant on the project site was closed.⁵⁴ Since 1985, the Sanitary District has maintained administrative offices in temporary trailers and a corporation yard for maintaining equipment, storing supplies, overnight parking of District vehicles, and fueling vehicles. In 1998, the City of Larkspur approved the Sanitary District's application to demolish the treatment plant and backfill the project site. Demolition of the treatment plant and grading of the site was completed in 1999-2000. As discussed in Hazards and Hazardous Material above, the fill imported to the site to complete the removal of the former wastewater treatment plant was found to be contaminated with hazardous wastes, which are proposed to be removed prior to new construction. (See pp. 54-57 in the Hazards and Hazardous Material subsection for a detailed discussion of contaminated fill on the project site.)

Currently, public service/industrial activities related to Sanitary District No. 1 occupy a portion of the project site, in the form of two temporary trailer office structures for administrative functions;

⁵⁴ The Central Marin Water Treatment Plant, located on Andersen Drive in San Rafael, serves central Marin County, including the cities of San Rafael, Ross Valley, Larkspur and Corte Madera.

three small, one-story equipment storage and maintenance sheds; two fuel dispensers and above-ground storage tanks; a pump house for the force main carrying sewage to the Central Marin wastewater treatment plant; and a parking lot for District employees. The remainder of the site is vacant, predominantly unpaved land. The flat portions of the site are used for temporary parking by ferry patrons attending San Francisco Giants weekday daytime baseball games, as the ferry parking lots generally are full of commuter vehicles on weekdays. The project sponsor proposes demolition of existing on-site structures and construction of a mixed-use development, including 16 multi-family residential buildings, a business hotel, and replacement facilities for Sanitary District No. 1; therefore, it would change and intensify land uses on the project site.

A mix of high-intensity uses, including commercial (office and retail), multi-family residential, daycare, hotel, institutional, public service, and recreational uses exist or are currently being developed in the vicinity of the proposed project. The project would be close to existing multi-family residential uses and a daycare facility located north of the site. Multi- and single-family residential uses have been approved for properties immediately north and northeast of the project site. The project site is also located near a similar hotel use along Larkspur Landing Circle. Introduction of higher intensity residential and hotel uses on the project site, although a change for the project area, would be compatible with the existing and approved land uses of the surrounding area. The change in land use on the project site would not disrupt and divide an established community or the physical arrangement of the surrounding vicinity, nor have a substantial adverse impact on the character of the vicinity. The proposed project would link the existing commercial and residential uses surrounding the site and help form a contiguous community.

- b) The project site is on the San Quentin peninsula in the City of Larkspur; the San Quentin peninsula is physically separated from the rest of Larkspur by U.S. Highway 101. The site occupies a strategic location at the crossroads of Marin County and has been recognized as an important gateway to the City of Larkspur.⁵⁵ This is particularly so because of its proximity to a major interchange with U.S. 101 and East Sir Francis Drake Boulevard; the Golden Gate Ferry Terminal and Marin Airporter bus terminal, which provide transit service connecting Marin County to San Francisco/SFO International Airport; and the Richmond/San Rafael Bridge and Interstate 580, which provides access to the East Bay.⁵⁶ The *Larkspur General Plan* acknowledges the project site as being one of the few remaining sites in the City of Larkspur

⁵⁵ See City of Larkspur, *Larkspur General Plan 1990-2010*, Chapter 2, Land Use, December 1990, p. 45.

⁵⁶ City of Larkspur, *Larkspur General Plan 1990-2010*, "Chapter 2, Land Use," December 1990, p. 24.

capable of sustaining substantial development with access to a variety of regional transportation options. Therefore, the strategic location of the project site is suitable for the high-density mixed-use development proposed for the project site.

The project site's land use designation in the *Larkspur General Plan* is Residential Medium Density, allowing up to 12 dwelling units/acre, and Administrative and Professional Office. These General Plan land use designations allow development of about 61,000 sq. ft. of office space and up to 72 multi-family dwelling units on the project site. The project would therefore require a General Plan Amendment to change the land use designation for the project site from Administrative and Professional Office and Medium Density Residential to Commercial, Residential High Density allowing up to 21 dwelling units/acre, Public Facilities, and Open Space (Parkland) for the 10,000 sq. ft. of site area proposed to be dedicated to Miwok Park expansion. The project would also require General Plan text amendments, including adding an exception to the maximum FAR requirement for the Commercial land use designation in order to permit hotel use with a maximum FAR of 1.0. Assuming the General Plan amendments are approved, the project would not conflict with applicable land use plans, policies or regulations.

The San Quentin Peninsula region, including the project site, is generally zoned Planned Development (Chapter 18.55). The purpose of the Planned Development (P-D) district is to establish for certain City areas a level of planning and development policy consistent with the *Larkspur General Plan*, yet sufficiently flexible to permit detailed planning at the time of development. The P-D district is intended to allow for (i) inclusion of a mix of uses within its area boundaries, and (ii) building intensities or design characteristics that would not normally be permitted in any single use district. This variation is permitted only through the adoption by the City of a Preliminary Development Plan that illustrates orientation, interrelationship and compatibility of the proposed land uses. Upon approval of the Preliminary Development Plan, the project sponsor would be required to apply for a Precise Development Plan. The Precise Development Plan is required to be in substantial conformance with the approved Preliminary Development Plan. The Precise Development Plan submittal would include detailed information about site topography, existing site features, density of proposed uses, and project design (including location and orientation of proposed buildings), to allow the inclusion of a mixture of uses, building intensities or design characteristics that would not normally be permitted in any single use district.

The P-D district is intended to be employed in areas where larger tracts of land are subject to potential development and where coordination of such development is essential to achieve unique

and innovative community design. There are several standards and regulations that apply in the P-D district. These are:

- With some exceptions, the minimum area on which a P-D district may be established is four acres of contiguous land;
- Land uses permitted in any other district may be permitted in the P-D district;
- Standards for lot area, frontage and width, coverage, density, building heights, landscaping and parking for uses in a P-D district are the standards of the zoning district governing uses most similar to the uses proposed in the P-D district;
- All land designated parks and/or open space must be conveyed, at the option of the City, following designated procedures; and
- The streets, bikes paths, and pedestrian ways within and bordering a P-D district shall be offered for dedication to the City. Standards for public improvements shall be governed by applicable ordinances and laws of the City or shall be as established by the City Public Works Department for the development under consideration.

Development standards of the applicable zoning districts, including parking requirements, would apply to the proposed use. The project sponsor proposes uses most similar to the following zoning districts on the project site zoned P-D:

Proposed Uses	Applicable Zoning District
Hotel and Sanitary District	C-2 Commercial District (Chapter 18.48)
Residential Use	R-3 Third Residential District (Chapter 18.32)

In accordance with P-D district standards and regulations, the project sponsor proposes a mini park on the southern portion of the project site. The project sponsor also plans to dedicate approximately 10,000 sq. ft. of park area near the northeast corner of the site for the expansion of Miwok Park. As discussed in XIV. Recreation below, this park area dedication along with the implementation of Mitigation Measure Rec1—the provision of two parking spaces on or adjacent to Lincoln Village Circle—would allow for the provision of a public pedestrian trail connecting Lincoln Village Circle to Miwok Park. A portion of this pedestrian trail would run through the site of housing project approved to the immediate north of the project site.

The project would require certain exceptions to the Zoning Ordinance as listed in the Project Description section on pp. 12-13. The project would also require Preliminary and Precise Development Plans, a Circulation Assessment Permit, a Heritage Tree Removal Permit, a Grading Permit, and Design Review for the proposed development. A Subdivision Map would

be required to create separate parcels for the Sanitary District, hotel, and residential uses, and for residential condominiums.

- c) The project site is not within any habitat conservation plan or natural community conservation plan. Therefore, the project would have no impact on any biological resources plan. There are no agricultural resources or operations on or adjacent to the project site; therefore, the project would not have a significant impact on agricultural resources.

Overall, the proposed project would not result in significant environmental impacts related to land use and planning.

X. MINERAL RESOURCES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-b) The Division of Mines and Geology (DMG) has classified urbanizing lands within the North San Francisco Bay Production-Consumption Region according to presence or absence of sand, gravel, or stone deposits that are suitable as sources of aggregate. The project site is located in an area that has been classified as Mineral Resource Zone 1 (MRZ-1). Areas that are classified MRZ-1 are “areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.”⁵⁷ Since no mineral resources of value to the region are known to exist within the project site, development of the proposed project would have no effect on the availability of known mineral resources.

Although the site was a clay quarry for brick-making in the 1800’s and early 1900’s, the use is no longer applicable because much of the clay has been removed from the site and brick-making

⁵⁷ California Department of Conservation, Division of Mines and Geology (CDMG), *Mineral Land Classification: Aggregate Materials in the San Francisco-Monterey Bay Area: North San Francisco Bay Production Consumption Region*, 1987.

would no longer be feasible on the site. The project would not include quarrying, mining, dredging, or extraction of locally important mineral resources on site, nor would it deplete any nonrenewable natural resource. Therefore, the project would have no impact related to mineral resources.

XI. NOISE	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-d) The project site is located near East Sir Francis Drake Boulevard, a major through roadway in Larkspur; therefore, it is in an area with relatively high ambient noise levels caused mainly by vehicular traffic. Accordingly, the project would be the recipient of existing and future noise, and it would contribute to the noise environment. For impacts of the existing and future environment on the project, the primary areas of concern would be (i) traffic noise impacts on the residential and hotel buildings proposed on the site, and (ii) future operational noise from the relocated

Sanitary District No.1 facilities at the existing daycare facility and residential uses proposed to be located near and above the District No.1 facilities. For noise impacts associated with construction of the proposed project, the primary areas of concern would be (i) project-generated traffic noise, (ii) operational noise from on-site mechanical equipment, and (iii) temporary construction noise.

The City of Larkspur has adopted a Health and Safety Element as part of its *General Plan 1990-2010*. The Health and Safety Element includes a chart showing noise-land use compatibility standards for various land uses planned in new developments in Larkspur.⁵⁸ According to the chart, a Day-Night Average Sound Level (DNL) of 55 dBA or less is considered “normally acceptable” for single and multi-family residential uses.⁵⁹ This residential rating is also consistent with the Health and Safety Element’s Goal 11, which requires that indoor noise levels not exceed 45 dBA in new residential developments, and outdoor noise levels not exceed 55 dBA. A DNL of 55 to 70 dBA is considered “conditionally acceptable” for residential uses, according to the chart. A DNL of 60 dBA or less is considered “normally acceptable” for hotel uses, and a DNL of 60 to 70 dBA is considered “conditionally acceptable” for hotel uses, according to the Health Safety Element noise-land use compatibility chart. A “conditionally acceptable” rating for a specified use means development of that use would be considered compatible, provided detailed analyses of necessary noise reduction is prepared and necessary noise insulation features are included in the design of buildings for a specified use.

Chapter 9.54 in the Larkspur Municipal Code, also known as the City Noise Ordinance, contains noise control regulations for various noise sources. According to code, for exterior noise in residential areas, the noise limit is based on the noise level not to be exceeded for more than 30 minutes per hour. For residential uses, the limit is 50 dBA between 7 a.m. and 10 p.m., and 40 dBA between 10 p.m. and 7 a.m. measured at the residential location. For commercial uses, including hotels, the limit is 60 dBA anytime. The noise level limit is adjusted down by 5 dBA when applied to repetitive or impulsive noises. The Noise Ordinance also contains adjustments for the duration for the noise. For short duration noise (e.g., noise that occurs less than one minute per hour) the allowable levels in a residential zone would increase to 65 dBA during the day or 55 dBA at night. In commercial zones, the level increases to 75 dBA. Section 9.54.060 has exemptions to the noise level limits for construction activities. According to the ordinance,

⁵⁸ Larkspur’s noise-land use compatibility standards are based on the State of California noise-land use compatibility guidelines for determining acceptable noise limits for specified land uses in new developments.

⁵⁹ DNL – Day-Night Average Sound Level; it is a 24-hour average noise level with a 10-dBA penalty added for sound during the nighttime hours of 10:00 p.m. - 7:00 a.m to account for the increased sensitivity to nighttime noises. dBA – The A-weighted sound level in decibels. A-weighting is a method of filtering a measured sound so that it corresponds with loudness as perceived by humans.

construction is allowed Monday through Friday from 7 a.m. to 6 p.m. and Saturday, Sunday and legal holidays from 9 a.m. to 5 p.m. All powered construction equipment must be equipped with intake and exhaust mufflers. Pavement breakers and jackhammers also must be equipped with acoustical attenuating shields or shrouds recommended by the manufacturer.

Title 24 of the California Code of Regulations requires that interior noise levels in any residential building be 45 dBA or less at night. This requirement is implemented in Larkspur in the *General Plan* Health and Safety Element Goal 11.

As is typical in most urban environments, vehicular traffic, particularly on East Sir Francis Drake Boulevard, dominates the noise environment in the project area. The area of the project site in the vicinity of East Sir Francis Drake Boulevard is exposed to a DNL (Day-Night Average Sound Level) of approximately 70 dBA L_{dn} ⁶⁰; this DNL is reduced to approximately 65 dBA L_{dn} or less for the northernmost portions of the site, located further away from East Sir Francis Drake Boulevard.⁶¹ Of all the structures proposed on-site, the two residential buildings - a Live/Work Row Townhouse building and an Auto Court Design 1 building - proposed in proximity to this roadway would be the most exposed to vehicular traffic noise (up to 70 dBA). The northernmost portions of the project site - the sites of the proposed hotel, the replacement facilities for Sanitary District No. 1, and one of the 16 residential buildings - would be exposed to noise environments of up to 65 dBA. The remaining residential buildings (13 of the 16 residential buildings), proposed to be located in the central portions of the project site would be exposed to a noise environment ranging from 65 to 70 dBA. Under the City's noise-land use compatibility guidelines, the 16 residential buildings and the hotel proposed on the site would be considered "conditionally acceptable" land uses in noise environments ranging from 60-70 dBA. The new Sanitary District No. 1 building (an industrial use), would be considered a "normally acceptable" land use in noise environments of up to 70 dBA.

⁶⁰ A November 2001 noise analysis prepared by Charles M. Salter Associates estimated an existing DNL of 70 dBA at 50 feet from the centerline of East Sir Francis Drake Boulevard. The noise analysis in the Initial Study prepared by EDAW for the Monahan Pacific Project in City of Larkspur, prepared May 22, 2002, measured a CNEL (Community Noise Equivalent Level) of 70-72 dBA L_{dn} at 50 feet from the centerline of East Sir Francis Drake Boulevard roadway. Figure 7-8: 1995 Noise Exposure Contours in the Larkspur General Plan Community Health and Safety Element shows the day/night average noise level for the project area in the 1990's to be 60-65 dBA L_{dn} .

⁶¹ The northernmost portions of the site, the sites of the proposed hotel, the replacement Sanitary District building, and one of the residential buildings, would be well over 100 feet away from the centerline of East Sir Francis Drake Boulevard. Noise levels typically attenuate at a rate of 6 dBA per doubling of distance. Therefore, if the DNL was 70 dBA at 50 feet from a noise source, it would decrease to 64 dBA at 200 feet from the same noise source.

As stipulated in the *Larkspur General Plan*, a detailed analysis of noise reduction requirements would be required for the 16 proposed residential buildings and the proposed hotel, and necessary noise insulation features would be included in the design of these buildings (see Mitigation Measure Noise3). With implementation of the *Larkspur General Plan* noise reduction requirement, including preparation of a detailed noise analysis for the proposed project uses and identification of necessary noise insulation to meet the interior noise levels specified in Health and Safety Element Goal 11 and California Code of Regulation's Title 24, the project sponsor would ensure that background traffic noise would not exceed the indoor noise level limit of 45 dBA. Therefore, background traffic noise would be considered a less-than-significant impact. Improvement measures included in the project in Mitigation Measure Noise3, such as additional noise insulation features in the design of the residences proposed closest to East Sir Francis Drake Boulevard, would further reduce residents' exposure to vehicular traffic noise.

The project would add new traffic to the existing roadway network. In order to evaluate the acoustical effect, traffic volumes for existing and future development conditions were obtained from the traffic impact analysis prepared by Dowling Associates in 2003 (summarized in Transportation, below).⁶² According to the 2003 traffic analysis, traffic due to the project would increase daily traffic volumes by two to three percent on all roadways surrounding the site but would not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system.⁶³ This change in traffic volume due to the proposed project corresponds to an increase of less than 1 dBA in the DNL. A 1 dBA increase in the DNL would be virtually undetectable and, therefore, would be considered a less-than-significant impact.⁶⁴

Mechanical noise from the project structures would also be required to meet the provisions of the City's noise ordinance. The City's ordinance would limit daytime (7 a.m. to 10 p.m.) noise levels from mechanical equipment to 50 dBA and nighttime noise levels (10 p.m. to 7 a.m.) to 40 dBA for no more than 30 minutes per hour at residential locations.⁶⁵ At the proposed hotel, the limit would be 60 dBA for no more than 30 minutes per hour during the day and night.⁶⁶ If mechanical equipment were to be located on top of the hotel, an analysis of the mechanical equipment screening by an acoustical consultant would be required as part of building design and permitting

⁶² Dowling Associates, Inc., *Traffic Impact Assessment and Parking Report for 2000 Larkspur Landing Circle*, November 20, 2003.

⁶³ *Ibid.*, p. 14.

⁶⁴ Federal Highway Administration, *Highway Traffic Noise Analysis and Abatement: Policy and Guidance*, June 1995, Section II: Noise Fundamentals, and Table B: Decibel Changes, Loudness, and Energy Loss, which shows that a 3 dBA change is barely perceptible.

⁶⁵ Larkspur Municipal Code Section 9.54.040.

⁶⁶ Larkspur Municipal Code Section 9.54.040.

to show that the local ordinance requirements are met. Since the project would comply with all applicable provisions governing noise in the Larkspur Municipal Code, mechanical noise impacts related to the hotel would be considered less than significant.

The Sanitary District No. 1 facilities would include not only mechanical equipment to heat and ventilate the building, but also equipment used to service and maintain the District's equipment. It is likely that future noise generated from mechanical activities of the relocated Sanitary District No.1 facilities would be audible to future occupants of nearby residences and the hotel, but it would be below levels expected to interfere with speech communication outdoors. Screening would be included for the District building operations equipment, and much of the service equipment would be located inside the District No. 1 facilities building.

The District would be required to meet City noise requirements limiting noise levels to 50 dBA during the day and 40 dBA at night at nearby multi-family residences (currently being developed to the north and east of the site and proposed on the project site), the proposed hotel, and the existing daycare center across Lincoln Village Circle. If the District were to change its hours of operation at the site to start work before 7:00 a.m., District Management would need to limit noisy outdoor activities (such as noise from backup signals on trucks) in order to meet the noise ordinance requirements at nearby residences. While meeting the City noise requirements would reduce mechanical noise impacts at the daycare center, residences, and hotel to less-than-significant levels, it is possible that noise from the District's operations would be considered annoying by some of the new residents, in particular by occupants of the two Auto Court Design 2 residential buildings planned immediately adjacent to the replacement District facilities. Residences on the upper levels that overlook the facility would experience the greatest amount of noise, although they would be slightly further away from the noise source than lower levels adjacent to the District building. As for other residential buildings on the project site, the *Larkspur General Plan* requirements to prepare a detailed noise analysis and identify necessary noise insulation to meet the interior noise levels specified in Health and Safety Element Goal 11 and California Code of Regulation's Title 24, would ensure that the indoor noise level limit of 45 dBA is not exceeded in these residential buildings. Improvement measures included in the project, such as additional noise insulation features in the design of these residences included in Mitigation Measure Noise3, would reduce residents' annoyance with noise.

Project construction activities would cause temporary, intermittent noise effects in the immediate project vicinity for the duration of construction. Noise would also be generated because of increased haul truck traffic on area roadways and the transport of heavy materials and equipment

to and from the project site, for the duration of the construction. Construction for this type of project would typically occur in several phases: site preparation and grading, foundation work, framing, and interior finishing. The noisiest of construction activities tends to be the grading and foundation work where heavy machinery is used. The U.S. Environmental Protection Agency found that the noisiest equipment at construction sites, including earthmovers, material handlers and portable generators, generate typical maximum noise levels of 88-91 dBA at 50 feet. The City noise ordinance exempts construction activities from noise controls, except for impact tools like jackhammers, but limits the hours during which construction can occur to avoid disturbance during evening and nighttime hours. In general, meeting the requirements of the noise ordinance would reduce construction noise impacts to less-than-significant levels, given the temporary nature of this noise source (see Mitigation Measure Noise1).

An existing daycare center is in the Remillard Cottage, located near the northwestern entrance to the site on Lincoln Village Circle. This daycare center would be exposed to intermittent noise from construction traffic and construction activities. Noise would primarily affect the daycare center during construction of the hotel at the northwest corner of the site, near the intersection of Larkspur Landing Circle East and Lincoln Village Circle. Maximum noise levels are estimated to reach up to 80 dBA at the school during the noisiest construction activities, which would occur for the first month of the construction period for the proposed hotel. This would be considered less than significant due to its short duration. Portable generators could be in use for longer periods of time and could result in noise levels of over 80 dBA at the daycare center or new residential uses on the EAH and Monahan Pacific sites, depending on their distance from these uses. Mitigation Measure Noise2 would require that portable generators be placed at least 200 feet from the daycare center or occupied residences, and that line power be obtained within four weeks of initiation of construction in these areas. This measure would reduce construction impacts to less-than-significant levels.

- e-f) The project site is not within any airport land use plan or within two miles of any airport or airstrip. Therefore, the project would not impact, or be impacted by, an airport land use.

Mitigation Measures

Mitigation Measure Noise1. Project sponsor shall include in construction contracts a requirement that the construction contractor comply with the City Noise Ordinance limitations on hours of construction (Monday through Friday 7 a.m. to 6 p.m., Saturday, Sunday and legal holidays 9 a.m. to 5 p.m.), and with

requirements to install intake and exhaust mufflers on construction equipment and install acoustical shields or shrouds on pavement breakers and jackhammers.

Mitigation Measure Noise2. Portable generators shall be placed on the site as far as possible from the daycare center and occupied residences, at least 200 feet away, and the contractor shall be required to obtain line power within 4 weeks of initial use of a portable generator near these uses.

Mitigation Measure Noise3. Noise insulation features shall be incorporated in the design of the proposed hotel and residential development, especially in residential buildings adjacent to East Sir Francis Drake Boulevard to reduce residents' exposure to vehicular traffic noise on this major arterial, and in residential buildings adjacent to the Sanitary District No. 1 maintenance facility to reduce residents' annoyance with noise from the adjacent facility. The construction drawings submitted to the City for review shall demonstrate conformance with this requirements and shall demonstrate that all residential buildings will meet the requirements of Goal 11 of the *Larkspur General Plan* Health and Safety Element and of California Code of Regulations Title 24 requirements specifying interior noise levels of 45 dBA or less with windows closed.

To reduce exterior noise levels in exterior activity areas to the extent feasible, for the Live/Work Row Townhouse building and the Auto-Court buildings sited closest to East Sir Francis Drake Boulevard, these areas shall be located on the sides of buildings away from East Sir Francis Drake Boulevard, and for the Green Court building, located adjacent to the relocated Sanitary District No 1 facility, these areas shall be located on the side of the building facing away from the District building. Alternatively, the project sponsor shall develop building designs that reduce exterior noise levels in primary outdoor living spaces to 55 dBA CNEL.

XII. POPULATION AND HOUSING	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XII. POPULATION AND HOUSING
(cont'd.)**

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

□	□	□	■
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Discussion

a-c) The project is a mixed-use development and proposes to build 126 residential units and an 80-room hotel. The residential component of the project is intended to help satisfy the demand for moderately priced housing in Central Marin. The project would include 25 units (19.84 percent of the 126 units) affordable to low- and moderate-income individuals and families earning less than 80 to 120 percent, respectively, of the areawide median income. Based on household density factors in the Larkspur area (approximately 2.18 persons per dwelling unit), the proposed residential development with 126 units is estimated to accommodate approximately 275 residents on the project site.⁶⁷ The increase in numbers of residents on the project site would not substantially increase the area-wide population. The residential population in the Larkspur area is projected to grow by approximately 1,600 people in the 2000-2020 time period,⁶⁸ and the number of residents expected to be added to the project site due to the proposed residential development would be well within this 2020 forecast.

With the exception of the project site, there are few large undeveloped sites available in Larkspur that would meet the City's Regional Housing Needs Determination (RHND) housing allocation of 303 units. The 126 residential units proposed on the project site would help meet 41.58 percent of Larkspur's anticipated regional housing allocation. Therefore, the proposed residential development on the project site would substantially make up the shortfall in Larkspur's regional housing allocation.

⁶⁷ According to the City of Larkspur Draft Housing Element-Housing Needs Analysis (*Source*: <http://www.ci.larkspur.ca.us/housingelement/HousingNeedsAnalysis.pdf>), the average household size in the City of Larkspur was estimated to be 2.18 in the year 2000, expected to grow to 2.24 by the year 2010, and then decline to 2.19 by the year 2020. According to the U.S. Census Bureau, *Census 2000* data (*Source*: <http://factfinder.census.gov/>), the total population of Larkspur is 12,014 people, and the number of occupied housing units in the city is 6,178. Therefore, the occupied housing unit (or household) density in Larkspur was approximately 1.94 persons per household (12,014 divided by 6,178=1.94) in the year 2000. To be conservative, the larger average household size number (2.18) estimated by the Draft Housing Element-Housing Needs Analysis has been used in the population and housing analysis.

⁶⁸ See City of Larkspur Draft Housing Element-Housing Needs Analysis, p. 12, (*Source*: <http://www.ci.larkspur.ca.us/housingelement/HousingNeedsAnalysis.pdf>), accessed August 20, 2004.

Currently, there are no residential units on the project site. No displacement of housing or people would occur as a result of the proposed project. Therefore, the project would have no impacts on existing housing in the City.

There are no existing commercial uses on the project site. The project would remove three single-story structures used by Sanitary District No. 1 on the site. Removal of the existing District facilities on site would not displace existing employees, because these facilities would be relocated to another portion of the site. Based on an employment density factor of 0.75 employees per hotel room, the proposed 80-room hotel would be expected to add approximately 60 employees to Larkspur's economy.⁶⁹ This increase in employment (60 total jobs) would be about 0.39 percent of total employment projected for Larkspur in year 2020 (15,530 jobs)⁷⁰, and it would be about 3.95 percent of projected employment growth from 2000-2020 (1,520 jobs). This potential increase in employment would not be substantial in the context of total employment growth in Larkspur.

The increase in employment opportunities on the project site would create a demand for new housing. Based on an employee density factor of 1.12 per household,⁷¹ the increase in employment due to project development would create an additional demand for approximately 53 residential units. The approximately 126 residential units proposed on the site would more than meet the calculated demand for approximately 53 residential units created by new project employment. Twenty five of the 126 proposed units would be affordable housing units. Nevertheless, it is possible that some new employees would not be able to afford housing in Larkspur; therefore, some of the housing demand would be expected to occur elsewhere in Marin or Sonoma County or in other parts of the Bay Area. Housing demand in and of itself is a socioeconomic issue, not a physical environmental effect. This socio-economic issue may cause physical environmental effects such as cumulative traffic impacts, discussed in the Transportation/Traffic section on pp. 85-96 of this Initial Study. The project would not directly or indirectly induce substantial, unanticipated population or housing growth, exceeding regional projections.

⁶⁹ Keyser Marston Associates, Inc. and Gabriel Roche, Inc., *Jobs Housing Nexus Analysis, City of San Francisco*, July 1997, Table 2, p. 34

⁷⁰ <http://www.ci.larkspur.ca.us/housingelement/HousingNeedsAnalysis.pdf>, accessed September 16, 2004

⁷¹ According to the U.S. Census Bureau, *Census 2000* data (*Source*: <http://factfinder.census.gov/>), the total number of employed persons living in Larkspur is 6,918, and the number of occupied housing units (households) in the city is 6,178. Therefore, the employee density factor per household in Larkspur was estimated to be approximately 1.12 employees per household (6,918 divided by 6,178=1.12) in the year 2000.

Overall, no significant environmental impact on housing demand or population would occur due to the project.

XIII. PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a) The proposed project is in an area that is currently served by fire, police, and paramedic services, schools and other public facilities. The project sponsor proposes to develop hotel and residential uses on the site.

Although the project could increase the number of police and fire protection-related calls received from the area or the level of regulatory oversight that must be provided as a result of the increased concentration of activities on the project site, the increase in responsibilities would not likely be substantial in light of the existing demand for fire and police protection and paramedic services in the City of Larkspur. Furthermore, the increase in demand would not require the construction of any new police or fire prevention or paramedic facilities. Therefore, the demand would not be a significant environmental effect.

The San Rafael City School District covers the San Quentin Peninsula including Larkspur Landing Circle East, and would serve the project area. The San Rafael City School District uses a generation factor in the range of 0.5 to 0.7 per dwelling unit to estimate the number of school

children in new residential developments.⁷² The project's proposed 126 residential units would generate about 63 to 88 new students at all grade levels for the school district. The project sponsor would be required to pay the standard one-time development impact fee, which is a fee charged to developers based on the floor area of new residential and commercial development. This fee is collected by the San Rafael City School District at the time the building permits are issued: it is currently \$2.05/sq. ft. for residential development, and 35 cents/sq. ft. for the hotel development.⁷³ The project would generate approximately \$582,708.50 in development impact fees for the San Rafael City School District. This development impact fee is considered full mitigation for any impacts to the public school system.

As discussed under XIV. Recreation below, the project sponsor proposes to provide a mini park, including a children's play area, in the southern residential portion of the site. The project sponsor also proposes to dedicate approximately 10,000 sq. ft. of park area near the northeastern corner of the site for the expansion of Miwok Park. The park area dedication would allow for the provision of a public pedestrian trail connecting Lincoln Village Circle to Miwok Park, thereby making this somewhat inaccessible park a functional public facility accessible to Larkspur residents. Therefore, the project would not adversely affect existing parks. With implementation of Mitigation Measure Rec1 (discussed under Recreation below), the project would enhance an existing public open space by helping provide parking and pedestrian access to Miwok Park.

Overall, the project would create additional demand for public services in Larkspur, but not in excess of amounts anticipated in the *General Plan*. Therefore, the project would have a less-than-significant impact on public services.

XIV. RECREATION	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁷² Telephone conversation with Mr. Dave Beeskau, Chief Business Official, San Rafael City School District, December 5, 2001.

⁷³ Telephone conversation with Ms. Joyce Correa, Accounts Payable Clerk, San Rafael City School District, December 6, 2001.

XIV. RECREATION (cont'd.)	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a-b) The northern portion of the shoreline (facing the project site) along Corte Madera Creek is designated Shoreline/Marsh Conservation area on the *Larkspur General Plan* Land Use Map. It is an approximately one-half mile long open space of varying widths (about 60 to 145 feet) between East Sir Francis Drake Boulevard and Corte Madera Creek. There are also three parks in the vicinity of the project site: Miwok Park, Remillard Park, and a neighborhood park, adjacent to the nearby daycare center on Larkspur Landing Circle East. Miwok Park and Remillard Park are two of the three parks in the City of Larkspur that include protected marshes and natural areas.⁷⁴

The approximately eight-acre Miwok Park is a landlocked steeply-sloped park to the immediate northeast of the project site. Its principal feature is Tubb Lake, a small artificial freshwater lake surrounded by willow trees at the top of a knoll.⁷⁵ The *City of Larkspur Mini Parks Master Plan* recognizes Miwok Park as a passive and undeveloped recreational facility.

The approximately seven-acre Remillard Park is south of East Sir Francis Drake Boulevard and east of the project site, opposite the former Handlogger’s property and the Monahan Pacific property. It includes parkland, a freshwater marsh, a wildlife sanctuary, and a narrow strip of beach along the edge of the Corte Madera Creek estuary. This park offers picnicking and fishing facilities.

An approximately two-acre neighborhood park is located north of Lincoln Village Circle to the rear of the project site and west of the Remillard Cooperative Daycare Center. The neighborhood park includes a parking lot accessible from Lincoln Village Circle. This park offers picnicking facilities and wide grassy areas for sitting or active recreation.

⁷⁴ City of Larkspur, *Larkspur General Plan 1990-2010*, Chapter 6, Environmental Resources, December 1990, p. 116.

⁷⁵ Tubb Lake is a remnant of the brick-making operation that existed on the project site and some of the surrounding property in the late 19th and early 20th centuries.

One of the goals of the *Larkspur General Plan* is to “plan and secure a complete and citywide system of trails and paths that link sections of Larkspur to one another and to neighboring communities and open space.”⁷⁶ The *Larkspur General Plan*, Figure 8-2: Bicycle/Pedestrian Circulation Plan, shows two planned paths to and from Miwok Park: the first from Larkspur Landing Circle East, and the second from East Sir Francis Drake Boulevard. The recorded Map of Larkspur Landing also shows two separate 25-foot-wide easements in the same general locations as indicated in *Larkspur General Plan*, Figure 8-2.⁷⁷ These easements affect the project site and Monahan Pacific/EAH property to the north and northeast of the project site. Figure 8-2 shows one easement beginning at Larkspur Landing Circle East, extending east over the project site and the Monahan Pacific property, and culminating at Tubb Lake. It shows the other easement beginning at East Sir Francis Drake Boulevard, extending over the Monahan Pacific property, leading to Tubb Lake, and finally connecting with a pedestrian trail further north at the Larkspur/San Rafael boundary.

According to the *Larkspur General Plan*, access is crucial to enhance Tubb Lake and the surrounding park to make it a functional public facility.⁷⁸ Providing public pedestrian access to the steeply-sloped Miwok Park has proved difficult. The only existing vehicular access to Miwok Park is via a 12-foot-wide dirt road on the 25-foot-wide easement beginning at East Sir Francis Drake Boulevard.⁷⁹ The lane configuration and limited sight distance makes the eastbound left turn from East Sir Francis Drake Boulevard into the easement unsafe for regular, on-going public use without additional traffic improvements. The *City of Larkspur Mini Parks Master Plan* contemplates paving this existing 12-foot-wide dirt road, and it will be paved as part of the Monahan Pacific project. Since the *Mini Parks Master Plan* refers to this dirt road as “emergency access only,” the paving is not expected to provide public access. While the project would make it easier for pedestrians and bicyclists to reach Tubb Lake and Miwok Park, and would add residents adjacent to the park, it is not expected that these features of the project would result in over-use and deterioration of this park. This is because vehicular access would not be provided to this park, therefore, it would be a relatively steep uphill climb to reach the park. No new amenities are proposed in the park that would draw unusual numbers of visitors.

⁷⁶ *Ibid.*, Chapter 8, Bicycle and Pedestrian Trails and Paths, p. 153.

⁷⁷ The City of Larkspur or any other municipal corporation, agency or district has the right of ingress and egress into and upon all designated easements throughout the City for the purposes of improvement, maintenance or repair.

⁷⁸ *Larkspur General Plan 1990-2010*, Chapter 6, Environmental Resources, p. 116.

⁷⁹ The City of Larkspur obtained the easements when it acquired Miwok Park in the 1970’s.

According to the *1972 Parks, Recreation, and Open Space Master Plan*, a major consideration for park planning in Larkspur is that most of its residential neighborhoods are in hillside areas. The hilly terrain makes it economically and environmentally difficult to provide parkland close to the City's residential neighborhoods. The project sponsor proposes to dedicate approximately 10,000 sq. ft. of park area near the northeastern corner of the site for the expansion of Miwok Park. This park area dedication and provision of two parking spaces as included in Mitigation Measure Rec1, discussed below, would allow for the provision of a public pedestrian trail connecting Lincoln Village Circle to Miwok Park, thereby making this somewhat inaccessible park a functional public facility accessible to Larkspur residents. A portion of the public pedestrian trail to Miwok Park would run through the Monahan Pacific/EAH property to the north which is currently approved for development of an affordable housing project.

Another objective stated in the *Master Plan* is to provide mini-parks within walking distance of residents.⁸⁰ Accordingly, the project sponsor proposes to provide a mini park, including a children's play area, in the southern residential portion of the site (see Figure 2: Project Site Plan, p. 4). Citywide plans, policies and regulations that are applicable to the project site are also discussed above in IX. Land Use and Planning.

Tubb Lake in Miwok Park and Remillard Park contain biological resources important to the community and the region, but there are no rare, threatened or endangered species in either park. The proposed project, and the residential development on the EAH and Monahan Pacific properties, could have an effect on the Tubb Lake watershed and other biological resources of Miwok Park by making access to the lake more convenient, and increasing daytime and residential populations near the lake and its new access.⁸¹ New residents could have pets that could affect wildlife in Miwok Park. While there are no endangered species in the park, there are California native plants that could be damaged as more people hike in the park. Until a few years ago, there was a house on the edge of Tubb Lake. The occupant of that house had pets and held numerous major gatherings of friends in the park. Therefore, existing conditions at Miwok Park and Tubb Lake already reflect effects of human pet activities. As stated above, since no vehicular access would be provided to Miwok Park, it would be a relatively steep uphill climb to reach the park. Additionally, no new amenities are proposed in this park. Therefore, it is not expected that this park would draw unusual numbers of visitors resulting in the over-use and deterioration of this park.

⁸⁰ City of Larkspur, *Larkspur General Plan 1990-2010*, Chapter 5, Community Facilities and Services, p. 93.

⁸¹ *Ibid.*, Chapter 6, Environmental Resources, p. 116. According to the *Larkspur General Plan*, lands adjacent to the park which are designated for residential development could have an impact on the Tubb Lake watershed.

The potential increase in the use of Remillard Park with project implementation could have an effect on the biological resources of the Remillard Park-Corte Madera Creek shoreline marsh areas. The freshwater marshes at the mouth of the Creek have already been greatly altered by the Army Corps of Engineers flood control project and by private development. All that remains of the marshes is a narrow fringe along northern and southern segments of the creek edge and small areas preserved at the College of Marin, Piper Park, Redwood High School, the Larkspur Ferry Terminal and Remillard Park.⁸² Pedestrian use of Remillard Park occurs now without substantial damage to the park. It is unlikely that the incremental increase in its use due to the proposed project could be so large as to cause a noticeable change in human effects on park resources.

Overall, the project would not create demand for, or cause over-use or deterioration of, public recreational facilities. The project would not adversely affect existing or planned recreational opportunities. With implementation of Mitigation Measure Rec1, it would enhance recreational opportunities by helping provide parking and pedestrian access to Miwok Park.

Mitigation Measures

Mitigation Measure Rec1. The project sponsor shall provide two parking spaces on or adjacent to Lincoln Village Circle to allow people to park and walk up to Miwok Park.

XV. TRANSPORTATION/TRAFFIC	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁸² *Ibid.*, p. 113.

XV. TRANSPORTATION/TRAFFIC (cont'd.)	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-b) Traffic Setting

The project site is bound on the south by East Sir Francis Drake Boulevard and on the west by the eastern portion of Larkspur Landing Circle, a semicircular roadway. Sir Francis Drake Boulevard is the key east-west through road in Marin County, stretching from Point Reyes on the West to the San Quentin Peninsula on the east. U.S. 101 divides Sir Francis Drake Boulevard, with the boulevard called Sir Francis Drake Boulevard and East Sir Francis Drake Boulevard on the two sides of the highway. In Larkspur, Sir Francis Drake Boulevard begins at the western boundary with Kentfield as a four-lane, divided roadway. As Sir Francis Drake Boulevard continues east through Larkspur, it intersects with Bon Air Road, El Portal, La Cuesta, and Eliseo Drive/Barry Way. These four intersections of Sir Francis Drake Boulevard are major streets in Larkspur leading to residential areas on the north side of the boulevard and to residential, commercial and retail areas on the south side. The intersection of Sir Francis Drake Boulevard and U.S. 101 is analyzed as two intersections: Sir Francis Drake Boulevard and the U.S. 101 northbound entrance ramps and the boulevard intersecting with U.S. 101's southbound entrance ramps. East of U.S. 101, East Sir Francis Drake Boulevard intersects with the semicircular Larkspur Landing Circle two times: Larkspur Landing Circle West and Larkspur Landing Circle East. East Sir Francis Drake Boulevard then passes the proposed project site, and thereafter becomes a two-lane road with left turn pockets. It intersects with the west gate entrance to San Quentin State Prison and with Andersen Drive in San Rafael, before connecting to Interstate 580 (I-580) and the Richmond-San Rafael Bridge.

In order to determine the impact of the proposed project, a *Traffic Impact Analysis and Parking Report* was prepared for Campus Cornerstone Larkspur, L.L.C. by Dowling Associates, Inc.⁸³ Ten intersections along Sir Francis Drake Boulevard between Bon Air Road and Anderson Drive, were analyzed. The ten intersections include the four Sir Francis Drake Boulevard intersections of Bon Air Road, El Portal, La Cuesta, and Eliseo Drive/Barry Way, the two intersections with the northbound and southbound entrance ramps to U.S. 101, and the four East Sir Francis Drake Boulevard intersections of Larkspur Landing Circle West, Larkspur Landing Circle East, Andersen Drive, and the west gate entrance to San Quentin State Prison. The following intersections were found to operate at an acceptable Level of Service D (LOS D) or better during both the peak AM and PM hours under existing conditions.⁸⁴

- Sir Francis Drake Boulevard at Larkspur Landing Circle East – LOS A in both AM and PM peak hours
- Sir Francis Drake Boulevard at Larkspur Landing Circle West – LOS B in AM peak hour, LOS D in PM peak hour
- Sir Francis Drake Boulevard at U.S. 101 southbound ramps – LOS B in both AM and PM peak hours
- Sir Francis Drake Boulevard at Eliseo Drive/Barry Way – LOS D in both AM and PM peak hours
- Sir Francis Drake Boulevard at Bon Air Road – LOS B in AM peak hour, LOS C in PM peak hour
- Sir Francis Drake Boulevard at El Portal – LOS A in AM peak hour, LOS B in PM peak hour
- Sir Francis Drake Boulevard at La Cuesta – LOS B in both AM and PM peak hours

Three intersections operate below LOS D:

- Sir Francis Drake Boulevard at U.S. 101 northbound ramps – LOS C in AM peak hour and LOS F in PM peak hour
- Sir Francis Drake Boulevard at the west gate of San Quentin – LOS F in both AM and PM peak hours
- Sir Francis Drake Boulevard at Anderson Drive in San Rafael -- LOS F in both AM and PM peak hours

These levels of service are based on traffic counts taken in 2001 and 2003 and do not reflect impacts of construction at the U.S. 101 interchange or the improvements to the Richmond/San Rafael Bridge.

⁸³ Dowling Associates, Inc., *Traffic Impact Assessment and Parking Report for 2000 Larkspur Landing Circle*, November 20, 2003.

⁸⁴ Ibid at p. 2.

The project site is across East Sir Francis Drake Boulevard from the mouth of Corte Madera Creek and opposite the Golden Gate Transit's Larkspur Ferry Terminal. The ferry provides service to and from the San Francisco Ferry Building and to and from SBC Park on days when baseball games are scheduled. Golden Gate Transit also provides bus service within Marin County. Bus route 29, which connects San Rafael and San Anselmo with stops at the Larkspur Ferry, Marin General Hospital, the Bon Air Shopping Center, and San Quentin State Prison, stops near the proposed project site on East Sir Francis Drake Boulevard, in between Larkspur Landing Circle East and Larkspur Landing Circle West. The Marin Airporter bus service is located at 300 Larkspur Landing Circle, across Sir Francis Drake Boulevard from the Larkspur Landing Ferry Terminal. While the Marin Airporter does not provide commuter service to San Francisco, it provides service to San Francisco International Airport.

Transportation Policies

The *Larkspur General Plan* Circulation Element, Policy d, establishes Level of Service D (LOS D) as the minimum acceptable Level of Service for signalized intersections, including the East Sir Francis Drake / northbound U.S. 101 ramps intersection:⁸⁵

- *Policy d:* Wherever possible, maintain standards for acceptable traffic Levels of Service during peak periods. Acceptable Level of Service (LOS) shall be defined for signalized intersections at the D level using planning procedures defined in Transportation Research Circular 212 or successor. The City acknowledges that LOS E exists at the following intersections and that most measures which would alleviate traffic congestion there would not be desirable:
 - Sir Francis Drake Boulevard at Eliseo Drive;
 - Sir Francis Drake Boulevard at La Cuesta Drive; and
 - Sir Francis Drake Boulevard at Bon Air Road.

For unsignalized intersections, service level C shall be the lowest level acceptable during peak periods. Because poor service levels at unsignalized intersections do not represent the same level of delay to motorists as at signalized intersections, the City should develop specific requirements on a case-by-case basis.

In addition, the *General Plan* includes the following policies and programs regarding traffic circulation relevant to the proposed project:⁸⁶

- *Policy c:* Except for singly-developed single-family homes and vacant properties, proposed changes in existing use shall not add traffic to Sir Francis Drake Boulevard.

⁸⁵ City of Larkspur, *Larkspur General Plan 1990-2010*, "Chapter 4, Circulation," December 1990, p. 83. Also available in an unpaginated online version at: <http://www.ci.larkspur.ca.us/40813.html#4-road>. See also City of Larkspur, *Larkspur Municipal Code*, Chapter 18.14, Section 18.14.020.

⁸⁶ *Larkspur General Plan 1990-2010*, at pp. 81-85.

- *Policy y*: Redesign and rebuild both US 101 interchanges (Sir Francis Drake Boulevard and Lucky Drive / Redwood Highway);
- *Action Program 2*: Actively cooperate with the County of Marin to seek workable capacity improvements to Sir Francis Drake Boulevard that are not disruptive to the community; and
- *Action Program 5*: Perform the following specific capacity and safety-related improvements:
 - Signalize the intersection of Sir Francis Drake Boulevard with Larkspur Landing Circle (east)
 - Make capacity enhancing improvements on East Sir Francis Drake Boulevard between Larkspur Landing Circle (west) and Highway 101, as follows: ...
 - extend the southbound-to-westbound merge lane at Larkspur Landing Circle (west) to the Highway 101 northbound ramps intersection, and create a third westbound through-lane at that intersection, with an exclusive right-turn lane.
 - add an eastbound through-lane at the Highway 101 northbound ramps intersection.

The *General Plan* further notes that “the intersections of Sir Francis Drake Boulevard with La Cuesta Drive and Eliseo Drive are either approaching or at capacity (LOS F). Other locations of concern are unsignalized intersections where turning traffic from the minor street has difficulty finding a gap - Larkspur Landing Circle (east), Andersen Drive, and El Portal.”

The City of Larkspur requires that major new projects be reviewed under the Circulation Assessment Permit Ordinance.⁸⁷ That ordinance assesses traffic impacts and permits development in proportion to the capacity of the proposed transportation network, and provides for a mitigation fee when appropriate. A Circulation Assessment Permit can be granted when the following two findings are made.⁸⁸

- 18.14.100 A – The project is consistent with the Larkspur General Plan and, as applicable, with the Downtown Specific Plan or other specific plans.
- 18.14.100 D – The agreement by the project sponsor to provide the project specific transportation system improvements as may be required by the City and to pay traffic impact fees as described in Chapter 18.15 which will provide the project’s proportionate share of the funds necessary to construct the transportation improvements as shown on the programmed transportation improvement list will adequately mitigate the project’s adverse impacts.

⁸⁷ City of Larkspur, Larkspur Municipal Code, Chapter 18.14, adopted May 1993, amended June 1994.

⁸⁸ The finding at 18.14.100 A is required. A project must then qualify for an additional finding among B through F.

The Circulation Assessment Permit Ordinance further notes that the payment of the traffic impact fee would be considered by the City to be mitigation of a project's impacts on the primary circulation system.⁸⁹

Traffic Impacts

The *Traffic Impact Analysis & Parking Report*⁹⁰ analyzed a slightly larger project than is now proposed: 130 residential units instead of 126, and 100 hotel rooms instead of 80 rooms. Therefore, the number of vehicle trips generated and the impacts to traffic and local infrastructure are slightly larger than would be likely to occur with the project as described in this Expanded Initial Study. Thus, the analysis results are conservative from an environmental analysis perspective.

Trip generation for proposed projects was calculated using the Institute of Transportation Engineers (ITE) generation rates. The *Traffic Impact Analysis and Parking Report* shows the following vehicle trips generated by the proposed project:

Land Uses	Weekday Daily Vehicle Trips	AM Peak Hour Vehicle Trips	PM Peak Hour Vehicle Trips
Hotel	523	40	41
Residential	762	57	71
<i>Total Trips</i>	<i>1285</i>	<i>97</i>	<i>112</i>

When traffic generated by the project is added to the existing traffic conditions, the delay at each of the ten analyzed intersections would increase by no more than 2.6 seconds per vehicle.⁹¹ The most impacted intersection was East Sir Francis Drake Boulevard at Larkspur Landing Circle East, which would degrade from LOS A in the AM peak hour (4.8 seconds of delay) to LOS B (7.4 seconds of delay), and would continue to operate at an acceptable level. None of the study intersections would experience a change in the level of service to below D with project-generated trips added. Therefore, the project would not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, and would not result in a project-specific traffic impact.

⁸⁹ City of Larkspur, Larkspur Municipal Code, Chapter 18.14.080.

⁹⁰ Dowling Associates, Inc., *Traffic Impact Assessment and Parking Report for 2000 Larkspur Landing Circle*, November 20, 2003.

⁹¹ Dowling Associates, Inc., *Traffic Impact Assessment and Parking Report for 2000 Larkspur Landing Circle*, at p. 3.

In addition to the streets operating at acceptable service levels, there are three intersections in the study area that currently operate at LOS F.

- Sir Francis Drake Boulevard at U.S. 101 northbound ramps – LOS F in PM peak hour (LOS C in AM peak hour)
- Sir Francis Drake Boulevard at the west gate of San Quentin – LOS F in both AM and PM peak hours
- Sir Francis Drake Boulevard at Anderson Drive in San Rafael -- LOS F in both AM and PM peak hours

These three project intersections remain at LOS F after project trips are added. The City of Larkspur has already adopted an improvement plan that would improve each of the three intersections operating at LOS F within the study area. The improvement plan, when implemented, would improve each of these intersections to LOS D or better. The planned improvements include:

- Addition of a third westbound through traffic lane at Sir Francis Drake Boulevard and U.S. 101 northbound ramps. This would improve the condition from LOS F (70.5 seconds of delay) to LOS D (29.8 seconds).
- Signalization of the Anderson Drive and East Sir Francis Drake Boulevard intersection. This would improve the condition from LOS F to LOS C (23.7 seconds) at its worst time period.
- Addition of a center left-turn acceleration lane at East Sir Francis Drake Boulevard and the west San Quentin gate.

The project sponsor would contribute traffic impact fees as part of the Circulation Assessment Permit which could, in turn, provide a portion of the funds for these planned improvements (see Mitigation Measure Trans1, below).

The City of Larkspur provided traffic projections of future traffic levels at all of the ten analysis intersections for the PM peak hour condition. The projections included the traffic generated by the project site based upon the current General Plan, the approved projects on Monahan Pacific/EAH property with 47 residential units, and other traffic growth within the Ross Valley. Under these cumulative conditions, five of the ten study intersections would operate below LOS D, resulting in a future significant cumulative impact. The two additional intersections, in addition to the three listed above that currently operate below LOS D, are:

- Sir Francis Drake Boulevard at Barry/Eliseo;⁹² and,
- East Sir Francis Drake Boulevard at Larkspur Landing Circle West.

These two intersections are projected to experience this deterioration in their level of service with or without the addition of the proposed project; therefore, the project would not be considered to contribute substantially to future cumulative impacts.

The same set of improvements adopted by the City to improve the LOS at the three intersections currently operating below LOS D would also improve the East Sir Francis Drake Boulevard at Larkspur Landing Circle West intersection to LOS D. The project sponsor would contribute traffic impact fees established as part of the Circulation Assessment Permit that would be available for these improvements (see Mitigation Measure Trans1 below).

The Circulation Assessment Permit requires that the proposed project be consistent with the *General Plan*. While the proposed project would change the land use designation for the site under the General Plan from “medium density residential and offices” to “commercial, high density residential, and public facilities,” the transportation impacts would be similar to or less than the impacts that would result from buildout under the existing *General Plan* designation. The current *General Plan* provides for site development of 61,000 square feet of office use and 72 multiple family dwelling units. The uses contemplated in the *General Plan* uses would generate approximately 1,094 daily and 127 AM and 130 PM peak hour trips. The proposed hotel/residential project would generate approximately 191 more daily trips than the General Plan designation, but about 48 fewer peak hour trips.⁹³ Since peak hour trips have a greater impact on traffic, the proposed project would have a lesser impact on traffic than the buildout projected pursuant to the *General Plan*.

Construction of the proposed project would require importing 25,000 cubic yards of fill for grading the site. Moving 25,000 cubic yards would require about 2,500 total truck trips assuming use of 20-yard trucks. The imported fill would most likely be transported to the site during an approximately 2-4 week period and stockpiled for later placement, resulting in about 50 to 125 truck trips per weekday. This is the largest number of truck trips expected during construction activities. The likely route of these trucks would be either east or west on East Sir Francis Drake Boulevard, connecting to either U.S. 101 or to I-580 and the Richmond-San Rafael Bridge

⁹² Under the *Larkspur General Plan*, the LOS D standard is not applicable at the Barry/Eliseo/Sir Francis Drake Boulevard intersection.

⁹³ Dowling Associates, Inc., *Traffic Impact Assessment and Parking Report for 2000 Larkspur Landing Circle*, at p. 7.

beyond. The impact of construction truck traffic on East Sir Francis Drake Boulevard would temporarily reduce its carrying capacity due to the slower movement and larger turning radii of the trucks, which may affect traffic and transit operations. However, as the disruption would be temporary in duration, it would not be a significant traffic impact.

The addition of construction worker vehicle and transit trips would not substantially affect the existing transportation conditions; any impacts to traffic or transit conditions would be similar to or less than those described for the proposed project.

In the event that site preparation activities displace ferry parking spaces, the project sponsor shall notify Golden Gate Transit at least 90 days in advance, so that alternative parking arrangements can be made (see Mitigation Measure Trans2 below).

- c) The project site is not within any airport land use plan area or near any airport or private airstrip. The project would therefore have no impact related to air traffic patterns.
- d) The project would not increase traffic hazards at the project site. Site circulation and access were evaluated by Dowling Associates, Inc. The report found that circulation components are consistent with industry standards and on-site roads provide sufficient maneuvering space for emergency vehicles. No sharp curves or dangerous intersections are included in the site plans, nor are the uses on the site incompatible with the neighboring uses. The proposed project would continue the already existing Sanitary District uses, but with access for the District's trucks located on Lincoln Village Circle, beyond the existing driveway on Larkspur Landing Circle East. The Sanitary District driveway would provide an entrance for the District vehicles separate from vehicles related to residential and hotel uses, and this would avoid potential conflicts with these non-industrial uses. All maneuvering and turning around would occur in the District's upper parking lot, avoiding potential conflicts on Lincoln Village Circle with the Remillard Cottage Children's Daycare Center and the residential project currently being developed by EAH. About 0.16 acres of Lincoln Village Circle are within the boundaries of the project site.
- e) The parking shortfall could result in parked cars impeding emergency access as described under subsection (f) below. Mitigation Measure Trans3 would mitigate the parking shortfall, thereby reducing emergency access impacts to less-than-significant levels. The proposed project would improve the accessibility of emergency vehicles to Drake's Cove, an approved project sponsored by Monahan Pacific that is located to the east of the proposed project. Accessibility would be improved because emergency vehicles would be able to use the Spine Road in the proposed

project as an alternative route to reach Drake's Cove in addition to the Sir Francis Drake Boulevard entrance to Drake's Cove. As such, the project would improve, rather than impede, the passage of emergency vehicles in the area. With implementation of Mitigation Measure Trans3, the project would have a less-than-significant environmental impact related to emergency access.

- f) Off-street parking and loading requirements for the City of Larkspur are established in the Larkspur Municipal Code, Chapter 18.56. That provision requires the proposed project to provide 253 spaces for the 126 residential units; 29 guest parking spaces; and one off-street parking space per hotel room or 84 off-street parking spaces for the hotel. The total requirement under the Code is 366 spaces for the hotel and residential uses. The project proposes 222 off-street covered parking spaces for the residential units, which provides an average of 1.76 off-street spaces per unit. Some of these spaces are proposed to be provided in a tandem parking arrangement, rather than independently accessible spaces. The project would include 42 on-street parking spaces, 29 of which would fulfill the requirement for guest parking. While the other 13 on-street parking spaces could be used by residents, they would not comply with the Code requirement to provide off-street parking for residential units. Therefore the project would have a shortfall of 31 parking spaces for the residential units. The hotel site would include 78 off-street parking spaces, or 6 fewer than required. In total, the project would have a shortfall of 37 spaces. The Sanitary District No. 1 facility would include 44 parking spaces for employees and visitors in addition to 20-25 spaces for District trucks, meeting requirements for this component of the project.

While the Institute of Transportation Engineers (ITE) *Parking Generation Manual, 2nd Edition*, shows a demand for 140 parking spaces for the proposed 126 residential condominium units,⁹⁴ experience in the City of Larkspur has shown that the number of parking spaces required in the city Codes is necessary to fully satisfy the residential parking demand under typical circumstances.⁹⁵ The 13 on-street parking spaces are not shown on the project site plan to be located proximate to some residential buildings having parking shortfalls. With a shortfall of 31 spaces, some residents could park in areas not designated for parking along the local streets near their units in the project site, reducing the travel area and potentially blocking access for emergency vehicles. Because the project's internal streets would be private, there would be no

⁹⁴ John N. Dowden, Dowling Associates, Inc., letter to Mike Hooper dated April 29, 2004, citing Institute of Transportation Engineers, *Parking Generation Manual, 2nd Edition, 1987*.

⁹⁵ Robert L. Harrison, memorandum to Turnstone Consulting dated August 20, 2004.

enforcement of inappropriate parking. This could result in hazardous conditions on the project site. The parking shortfall is considered to be a potentially significant environmental impact. Mitigation Measure Trans3 would reduce this impact to less-than-significant levels.

The ITE *Parking Generation Manual* shows a demand for 63 parking spaces for the 80-room hotel, substantially fewer than the 78 spaces proposed. Some hotel guests would be expected to use the Marin Airpporter, located at 300 Larkspur Landing Circle West, near the project site, rather than a leased vehicle, and others may arrive by ferry or taxi. Therefore, the hotel parking shortfall of 6 spaces alone would not result in significant parking impacts, and no mitigation is required.

A portion of the project site is presently used for overflow parking for ferry patrons attending a San Francisco Giants baseball game on weekday afternoons that occur on about 10 to 15 days during spring and summer. The temporary parking area includes prominent signs indicating that parking is not permitted after 10:00 p.m. This would preclude use of the area to attend night baseball games because the ferry following night games leaves the ballpark 20 minutes after the end of a game, generally about 10:00 to 10:30 p.m., and would not arrive at the ferry terminal before about 11:00 p.m. Because the ferry to night baseball games leaves the Larkspur terminal at 5:50 p.m., parking is available for baseball patrons in the parking lots at the ferry terminal as commuters return from San Francisco on earlier commuter ferries. The proposed project would displace the cars parked on the project site, and the Golden Gate Bridge, Highway & Transportation District would need to make other arrangements for this occasional parking demand. Mitigation Measure Trans2 requires that project sponsor notify the District 90 days prior to the beginning of site preparation to provide sufficient time for the District to make other arrangements for daytime baseball game parking.

g) *Ferries and Buses*

The *Larkspur General Plan 1990-2010* includes policies encouraging alternative transportation modes. The Larkspur General Plan, Chapter 4: Circulation, includes the following policies and programs regarding mass transit use, such as buses and ferries:⁹⁶

- Goal 5: Encourage attractive alternatives to the use of single-occupant automobiles.
 - Policy o: Coordinate circulation and development so higher intensity uses such as commerce, professional offices, public services, and higher density residences are near major transit routes and are served by public transit facilities.

⁹⁶ City of Larkspur, *Larkspur General Plan 1990-2010*, “Chapter 4, Circulation,” December 1990, pp. 85-86.

The proposed project furthers both Goal 5 and Policy o by locating higher density housing and a business-serving hotel near bus and ferry facilities. Placement near mass transit would encourage the use of alternatives to the single-occupant automobile and encourage the use of transit. Therefore, the proposed project would not conflict with transit policies or programs.

Bicycles and Pedestrians

The *Larkspur General Plan*, “Chapter 8: Bicycle and Pedestrian Trails and Paths” includes the following policies and programs:⁹⁷

- Goal 2: Provide safe bicycle and pedestrian routes for all users, to schools, shopping and business areas, recreation facilities, open space preserves, and other communities, and associated amenities.
 - Policy e: Locate and design pedestrian and bike trails separate from streets and automobile traffic wherever possible. Designate on-street bike lanes where off-road paths are not possible.
 - Action Program [8]: Require new development or redevelopment to provide appropriate sidewalks or paths.

The proposed project would provide enhanced pedestrian and bicycle access to Miwok Park and would provide access to an existing network of paths and trails to Remillard Park, the Sir Francis Drake Boulevard Bike Path, the Larkspur Landing Shopping Center, the Larkspur Ferry Terminal, and the Brick Kiln Office Building, as well as providing access to Drake’s Cove and Drake’s Way. Thus, the proposed project would not conflict with adopted City policies, plans, or programs related to alternative transportation modes. Therefore, the proposed project would have no significant environmental impacts related to policies, plans, or programs supporting alternative transportation.

Mitigation Measures

Mitigation Measure Trans1. The project sponsor shall contribute traffic impact fees as part of the Circulation Assessment Permit which would, in turn, provide a portion of the funds for planned improvements along Sir Francis Drake Boulevard and East Sir Francis Drake Boulevard.

Mitigation Measure Trans2. The project sponsor shall notify the Golden Gate Bridge, Highway and Transportation District (Golden Gate Transit) at least 90 days in advance of any site preparation activities

⁹⁷ City of Larkspur, *Larkspur General Plan, 1990-2010*, “Chapter 8, Trails and Paths,” December 1990, pp. 160-165.

that would displace ferry parking for daytime Giants baseball games or other ferry parking, to provide sufficient time for Golden Gate Transit to make alternative parking arrangements.

Mitigation Measure Trans3. To mitigate the parking shortfall for residential uses, the project sponsor shall reconfigure residential buildings and/or parking areas to meet the Larkspur Municipal Code parking requirements, reducing the total number of residential units if necessary.

XVI. UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project=s projected demand in addition to the provider=s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project=s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a-g) The proposed project is in an area where water service is provided by the Marin Municipal Water District, sewer facilities are managed by Sanitary District No. 1 and wastewater treatment service

is provided at the Central Marin Wastewater Treatment Plant, and local solid waste disposal is provided by Marin Sanitary Service at the Novato Landfill.

The project site is presently owned by Sanitary District No. 1 of Marin County,⁹⁸ and is under option to the project sponsor. The Sanitary District operated a wastewater treatment plant on the project site from 1949 until 1985 when the Central Marin Sanitation Agency (CSMA) wastewater treatment plant on Andersen Drive in San Rafael came on line.⁹⁹ The Sanitary District No. 1 provides collection service to the project site and would continue to do so after development of the project. Wastewater generated by the proposed project would be conveyed to the CSMA wastewater treatment plant via the Sanitary District No. 1 sewer. Treatment of wastewater at the CSMA plant would not be affected by the proposed project, because the CSMA is currently operating below capacity.¹⁰⁰ The Sanitary District No. 1 has also indicated that it has sufficient capacity to serve the project in addition to the District's existing commitments.¹⁰¹ Since the treatment of wastewater would be in accordance with Regional Water Quality Control Board requirements, and the project would comply with all regulations and procedures of Sanitary District No. 1 (including any wastewater pre-treatment requirements), the project would not result in a significant impact on sewer and wastewater treatment capacity.

The Marin Municipal Water District was contacted in October 2003 and April 2004 regarding adequacy of water supplies to meet the needs of the proposed project. According to the Water Availability Letter, dated October 9, 2003, the site has a historical water entitlement of 1.14 acre feet.¹⁰² The letter also states that the proposed development would require an extension of the Water District's existing water main in Larkspur Landing Circle East. This pipeline extension would have to be looped through the project and back to Larkspur Landing Circle East or to East Sir Francis Drake Boulevard. Water service to the project and the installation of these facilities are subject to approval of a Pipeline Extension Agreement by the District's Board of Directors. All costs associated with a pipeline extension would be borne by the project sponsor. Upon completion of the facilities installation required to serve this project and acceptance by the Marin

⁹⁸ Alternatively known as the Ross Valley Sanitary District.

⁹⁹ In 1948, Sanitary District No. 1 purchased 8.5 acres of the project site to build a sewage treatment plant, the first phase of which was constructed the following year. Further construction took place in 1961, 1975 and 1976. In 1977 the District purchased additional land from Lincoln Property Company, which increased the District's land holdings to about 10.6 acres.

¹⁰⁰ See Initial Study prepared by EDAW for the Monahan Pacific Project in City of Larkspur, May 22, 2002, p. 3-123.

¹⁰¹ Frederic L. Shulte, Office Manager, Sanitary District No. 1, Sewer Availability Letter to Michael Hooper, Campus Properties, LLC, 1299 Fourth Street, Suit 405, San Rafael, CA 94901, October 7, 2003.

¹⁰² Una Conkling, Project Manager, Marin Municipal Water District, Water Availability Letter to Michael Hooper, Campus Properties, LLC, 1299 Fourth Street, Suit 405, San Rafael, CA 94901, October 9, 2003.

Municipal Water District, water service would be granted under the conditions provided in the Water Availability Letter. According to the letter dated April 22, 2004, the Marin Municipal Water District can provide adequate water pressure and flow throughout the project development with the installation of appropriately sized water mains and a looped system.

The project would increase the consumption of water on the project site. This would incrementally increase the demand for water in Larkspur. The new construction would be designed to incorporate water-conserving measures, such as installing low-flush toilets and urinals, as required by the California State Building Code Section 402.0(c). The project would comply with the regulations and procedures of the Marin Municipal Water District. Since, the Marin Municipal Water District has indicated it would be able to supply water to the project (provided conditions of the Water District are met by the project sponsor), the project would not result in a significant impact on water supply.

No major construction of water or wastewater facilities would be required with development of the proposed project. Therefore, the project would result in a less-than-significant impact on water or wastewater facilities.

The project would not require the construction of new public storm water drainage facilities. As discussed under VIII. Hydrology and Water Quality, the project could result in increased storm water discharges. It is possible that increased discharges could exceed the capacity of the existing 36-inch culvert under East Sir Francis Drake Boulevard, so that flooding may occur at the inlet north of East Sir Francis Drake Boulevard. The hydrologic consultant for the project sponsor has therefore recommended that the inlet structure for the culvert crossing East Sir Francis Drake Boulevard be improved, and this has been included in the project as Mitigation Measure WQ3. With implementation of Mitigation Measure WQ3, the project would result in a less-than-significant impact on storm water drainage facilities.

Garbage service in Larkspur is provided by Marin Sanitary Service, Marin Recycling, and Marin Resource Recovery. Solid waste is disposed of at a landfill in Novato. Recycling services (for newspaper, cardboard, glass and metal) are provided by Marin Recycling, which is under the same ownership as the garbage company. As a result of aggressive recycling, 65.7% of Larkspur's waste stream is now diverted from the landfill.¹⁰³

¹⁰³ Telephone conversation with Ms. Beverly Wilhelm, Head of Scale Operation, Marin Sanitary Service. March 28, 2002.

The project is served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. The solid waste associated with project construction and operation would not substantially affect the foreseeable life of the landfill in Novato. The project would comply with federal, state and local statutes and regulations related to solid waste or recycling. Therefore, the project would not result in a significant impact on solid waste disposal capacity.

Based on the above analysis, the proposed project would have no significant impacts on utilities and service systems.

Mitigation Measure

See Mitigation Measure WQ3 described under Section VIII, Hydrology and Water Quality. Mitigation Measure WQ3 calls for modification of the inlet structure to the 36-inch culvert crossing under East Sir Francis Drake Boulevard.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) As discussed under Section IV, Biological Resources, the proposed project would have a less-than-significant impact or no impact on biological resources, with identified mitigation. As

discussed under Section V, Cultural Resources, the project would have a less-than-significant impact on cultural resources, with mitigation.

- b) The cumulative analyses for the Initial Study account for construction of the residential units on the Monahan Pacific/EAH property, future growth in use of the Golden Gate Ferry at the Larkspur Ferry Terminal, and other regional growth that would use the Sir Francis Drake Boulevard corridor. As discussed in Section XV, Transportation/Traffic, the project's contribution to cumulative traffic impacts along East Sir Francis Drake Boulevard and Sir Francis Drake Boulevard would be mitigated by contribution to the City's traffic impact fees to support improvements adopted by the City. The air quality and noise discussions are based in part on the traffic analysis. As indicated in Section III, Air Quality, the project would not result in a cumulatively considerable net increase in any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. As discussed in Section VIII, Hydrology and Water Quality, with implementation of mitigation measures the project would not increase the pollutant load discharged to San Francisco Bay; therefore, the project would not have a significant cumulative impact on Bay water quality. Overall, the project would have no cumulatively considerable impacts.

- c) As discussed throughout this Expanded Initial Study, with respect to each environmental topic, the project would have no substantial adverse impacts on human beings, either directly or indirectly.

MITIGATION

Aesthetics

Mitigation Measure Aes1. In order to ensure that there would be no adverse light and glare impacts on surrounding residential uses from the Sanitary District and hotel building, exterior lighting from sources greater than 40 watts shall be shielded such that there is no output above a horizontal line parallel to the ground; the exterior light levels shall be 0.2 foot-candles at the dimmest locations of parking lots and no more than 4-5 foot-candles at the brightest locations on each site; and light spill across property lines shall be no more than 0.1 foot-candles and no direct light source shall be visible at the property line. The project sponsor shall submit a detailed outdoor lighting plan, including computer calculations substantiating dimmest and brightest outdoor light levels on the Sanitary District and hotel sites and light levels at property lines, and including fixture data sheets to substantiate shielding. The lighting plan, prepared by a professional lighting consultant, shall be submitted to the City for review and approval prior to issuance of building permits.

See also Mitigation Measure Bio4 described under Section IV, Biological Resources. Mitigation Measure Bio4 calls for replacement of heritage trees removed by the project, and would reduce the project's impact on scenic resources (including loss of heritage trees) to a less-than-significant level.

Air Quality

Mitigation Measure AQ1. In order to reduce the quantity of dust generated during demolition of existing structures, the project sponsor shall employ the following measures: (i) water to control dust generation during demolition of structures and break-up of pavement; (ii) cover all trucks hauling demolition debris from the site; and (iii) use dust-proof chutes to load debris into trucks whenever feasible.

Mitigation Measure AQ2. In accordance with BAAQMD CEQA Guidelines (BAAQMD 1996), the following mitigation, recommended by BAAQMD for construction sites greater than 4 acres in area, shall be implemented in order to reduce short-term construction emissions to less-than-significant levels:¹⁰⁴

- Water all active construction areas at least twice daily.
- Water or cover stockpiles of debris, soil, sand or other materials that can be blown by the wind.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.

¹⁰⁴ This mitigation includes the BAAQMD-recommended Basic, Enhanced, and Optional Control Measures.

- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep daily (preferably with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
- Sweep streets daily (preferably with water sweepers) if visible soil material is carried onto adjacent public streets.
- Hydro-seed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).
- Enclose, cover, water twice daily or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.).
- Limit traffic speeds on unpaved areas to 15 mph.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- Replant vegetation in disturbed areas as quickly as possible.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.

Mitigation Measure AQ3. In order to reduce the quantity of dust generated during site preparation and construction, adjacent to the Remillard Cottage Children’s Daycare Center, the EAH housing north of the project site, and the Monahan Pacific residential development east of the project site, the project sponsor or prime contractor shall designate in the construction contract, a person at the superintendent level or higher to be the dust-control coordinator, subject to approval of the Planning Department, and shall provide this person’s telephone number to the daycare personnel and homeowners’ associations, and post this information on-site, in the nearby park, office buildings, and apartment buildings. This person shall respond to complaints within 24 hours or less and have the authority to take corrective action.

Mitigation Measure AQ4. In order to reduce the quantity of dust generated during site preparation and construction, areas to be disturbed within 100 feet of the children’s daycare center and nearby residences shall be presoaked using sprinklers for 48 hours before commencement of excavation or grading activities and overnight each day during the period of excavation and earthmoving.

Biology

Mitigation Measure Bio1. To mitigate the loss of coast live oak and grasslands with oak habitats, the project sponsor shall obtain approval from the City for, and then implement, a landscaping plan using all native species throughout the project site except along Larkspur Landing Circle and along the Spine Road to its intersection with the Spur Road at the entry to the project site. Alternatively, the project applicant

may propose an alternative location, either on-site or in the project vicinity, for replacement of the loss of approximately 2.15 acres of habitat on the site at the ratio of 1:1 (acre replaced: acre lost), or restoration of an existing marginal habitat area at the ratio of 2:1 (acres replaced: acre lost). Such alternative shall be reviewed by the City's consultants to determine mitigation adequacy prior to final approval of project landscaping.

Mitigation Measure Bio2. To mitigate the loss of the wetland on the project site, the project sponsor shall provide necessary funding for the City for implementation of ongoing maintenance at Tubb Lake for a period of five years. This maintenance shall be accomplished by: 1) ongoing removal of floating parrot feather vegetation from the lake, 2) ongoing removal of French and Scotch broom from the lakeshore, and 3) allowing natural growth of willows and cattails along the shore.

Mitigation Measure Bio3. To minimize shoreline disturbance and wildlife harassment at Tubb Lake by people and pets, the project sponsor, in coordination with the City, shall provide paved or decomposed granite paths and signs around Tubb Lake prior to occupancy of any uses on the project site.

Mitigation Measure Bio4. The project sponsor shall replace heritage trees removed at a ratio of 2:1 (planted: removed) for removed trees greater than 15 inches but less than 25 inches in diameter, and 4:1 for trees removed greater than 25 inches in diameter. The minimum number of replacement trees that shall be planted is estimated at 142. About 90 percent of the replacement trees should be located on the site, including the area proposed for park dedication. The remainder should be located on the City easement bordering the pedestrian trail outside the property boundary to provide a screen and wildlife corridor between this project and adjoining developments. Also, up to 10 willows and bays could be planted at Tubb Lake, where a limited amount of suitable space is available.

Trees to be planted shall range in size from 5-gallon to 24-inch box. Up to 20 percent shall be 24-inch box, with the remainder to be a reasonable variety of sizes, with no more than 15 percent in 5-gallon cans. Trees shall be obtained from a reputable native plant nursery.

Trees shall be caged and watered through at least the first two dry seasons. A seven-year monitoring plan shall be developed by the project sponsor and approved by the City; the monitoring plan shall include, but not be limited to, the following features:

- Detailed drawings and specifications defining locations of trees, showing caging installations, and showing irrigation systems.
- Monthly inspections by a qualified arborist to ensure that cages and irrigation equipment remain in place and functioning until the arborist determines that they are no longer required.

- A written plan for removal of irrigation equipment when the arborist determines that removal is appropriate.
- Quarterly inspections by a qualified arborist during the remaining years of the monitoring period, after irrigation equipment is removed.
- Replanting diseased or damaged trees as necessary to meet the goal identified below.

The trees' survival shall be recorded annually and reported to the City for seven years. At the end of seven years, the goal shall be to have at least 2 trees surviving for each tree removed. The project sponsor shall post a bond or provide other financial assurance in a form approved by the City for payment of this planting and monitoring work or pay the City in advance if the City assumes responsibility for the work.

Cultural Resources

Mitigation Measure Cull. The following steps shall be implemented during drilling for foundation piers (if the foundation type is used) in the area where important archaeological resources may occur:

- ❖ An experienced archaeologist shall be present for continuous monitoring of removal of drilled soils, including observation of soils in their stratigraphic layers as they are removed. The archaeological monitor shall be permitted to take appropriate samples as warranted.
- ❖ The archaeologist shall be authorized to stop or redirect project activity until an evaluation of the presence and integrity of any identified resource can be made.
- ❖ If it is determined that the archaeological resources are potentially significant, the archaeologist shall be authorized to undertake appropriate measures, including further evaluation and data recovery of artifacts in removed soils.
- ❖ Immediately following drilling of each pier hole, all artifacts removed must be appropriately catalogued. During and/or following on-site monitoring, all artifacts removed must be analyzed and, if appropriate, curated in a suitable repository.
- ❖ If human remains are encountered during drilling activities, drilling at that location shall stop and the Marin County Coroner shall be notified (as required by California Health and Safety Code Section 7050.5). In the event that the human remains are believed to be those of a Native American, the Most Likely Descendent will be identified, who will formulate an appropriate treatment plan in consultation with the archaeologist (as required by California Public Resources Code Section 5097.98). An appropriate treatment plan is expected to include removal of the remains with scientific recording and study, and timely return of the remains to the Most Likely Descendent for final reinterment.
- ❖ A final report shall be prepared describing methods used, results and findings of the archaeological monitoring and mitigation program. Copies of the final report shall be provided to

the City of Larkspur and the California Archaeological Site Survey Northwest Information Center.

Mitigation Measure Cul2. An experienced archaeologist shall be present for all earthmoving activities, excavation, and foundation placement below the level of the ground surface existing as of July 2000 within Area 2 on the project site to provide continuous monitoring of removal of soils, including observation of soils in their stratigraphic layers as they are removed. The archaeologist shall be permitted to take appropriate samples as warranted. If resources are encountered, the steps outlined in Mitigation Measure Cul1, shall be followed, substituting “excavation and grading” for “drilling” where appropriate.

Geology

Mitigation Measure Geo1. The project sponsor shall prepare and submit to the City for review a Final Geotechnical Investigation Report for the proposed project buildings prior to or at the same time as building plans are submitted for building permits review (*Larkspur General Plan*, Chapter 7, Community Health and Safety, Policy 1, Action Program [25] and [26](b)) and shall demonstrate compliance with all findings and recommendations in the Treadwell and Rollo preliminary geotechnical reports dated March 29, 1999, March 30, 2000, and October 9, 2003, unless these recommendations are expressly superseded in the Final Geotechnical Investigation Report.

Hazards

Mitigation Measure Haz1. The project sponsor shall not begin construction until after the remediation proposed in the *Phase II Soil Investigation of Import Fill, Former Waste Water Treatment Plant Site, 2000 Larkspur Landing Circle, Larkspur, California*, prepared by Questa Engineering Corporation, dated June 2004, has been completed.

Mitigation Measure Haz2. The project sponsor shall provide certification to the City prior to issuance of grading permits associated with placement of imported fill, that the imported fill has been tested and found to contain no California Code of Regulations Title 17 hazardous substances in concentrations exceeding San Francisco Bay RWQCB Environmental Screening Levels, or US Environmental Protection Agency, Region IX Preliminary Remediation Goals for residential sites.

Mitigation Measure Haz3. To protect against potential fire hazards within the proposed development, the project sponsor shall prepare, for City review and approval, and implement a project design that includes fire suppression systems such as sprinklering of buildings proposed on the project site.

Mitigation Measure Haz4. To reduce the possibility of catastrophic fires at an urban/wildland interface, the project sponsor shall prepare a landscape design that provides appropriately defensible space around each structure, for review and approval by appropriate City staff. The design shall avoid all potentially combustible landscaping, such as Scotch broom or Eucalyptus species, within 30 feet of structures, and shall avoid planting pine or Eucalyptus species in locations that could result in deposition of needles or leaves on building roofs. The project sponsor shall prepare a maintenance program to remove all dead vegetation from landscaped areas; the homeowner's association shall be required to implement the maintenance program, and a requirement to perform regular maintenance of landscaped areas shall be included in the Covenants, Conditions and Restrictions.

Hydrology and Water Quality

Mitigation Measure WQ1. The project sponsor shall prepare and implement a Construction Stormwater Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) to minimize the discharge of sediment and other pollutants during the construction phase of the project. The exact locations, extent, nature, and details of the BMPs shall be worked out in consultation with, and subject to review and approval of, the City of Larkspur prior to the issuance of grading permits. BMPs shall include but not be limited to:

- Project sponsor shall require that daily watering for dust control, soil stabilization controls, and perimeter silt fences be employed. Erosion control practices must be specified for the fill placement and compaction phase of the project. End-of-pipe sediment control measures (e.g., basins and traps) shall be used only as secondary measures. If, following the placement and compaction of fill, hydroseeding is selected as the primary soil stabilization method, then all areas shall be seeded by September 1 and irrigated as necessary to ensure that adequate root development has occurred prior to October 1.
- Project sponsor shall require that site drainage shall be prevented from contacting stored construction materials, equipment, and maintenance supplies (i.e., fuels, lubricants, paints, solvents, and adhesives), as well as waste construction materials and supplies, through the use of elevated platforms or berms or other diversion structures. Supply and waste storage areas shall be located at least 50 feet from drainage facilities and watercourses and shall not be located in any area prone to flooding.
- Project sponsor shall require that material and waste storage areas are protected from rainfall.
- Site supervisors shall conduct weekly on-site meetings to discuss pollution prevention. All construction personnel shall be required to attend such meetings.

- Project sponsor shall require that vehicle and equipment wash-down facilities be employed prior to exiting the site. These facilities shall be accessible and functional during both dry and wet conditions.
- The Construction SWPPP shall be maintained on-site and made available to Regional Water Quality Control Board staff upon request.

Mitigation Measure WQ2. The project sponsor shall prepare a Stormwater Management Plan (SWMP) specifying Best Management Practice to minimize impacts to surface water quality during the operational lifetime of the project. The sponsor shall incorporate as many concepts as practicable from *Start at the Source, Design Guidance Manual for Stormwater Quality Protection*. The exact locations, extent, nature, and details of the BMPs shall be worked out in consultation with, and subject to review and approval of, the City of Larkspur prior to the issuance of grading permits. Measures shall include but not be limited to:

- Weekly street sweeping;
- Implementing a Pesticide Management Program, including:
 - Properly identifying pests in order to select appropriate control
 - Avoiding injuring non-target species
 - Avoiding disposing of waste pesticides on site
 - Applying only the needed amount of pesticide
- Marking storm drain inlets “Drains to Bay”;
- Distributing pollution prevention educational materials to occupants of the completed project;
- Installing and maintaining a vegetated bioswale on the south and east sides of the site for storm drainage; and
- Using an in-line vortex device to remove debris, floatables, and sediment from storm drain flows not filtered through the bioswale.

The final design of project hydrologic features shall include measures designed to mitigate potential water quality degradation of runoff from all portions of the completed development. The SWMP shall describe how funding for long-term maintenance of the swale and vortex treatment device would be accomplished.

Mitigation Measure WQ3. All parking lot and building pad elevations shall be designed and constructed to be above 6.4 feet NGVD. In addition, the site drainage plan shall provide detailed plans for modification of the inlet structure to the 36-inch culvert crossing under East Sir Francis Drake Boulevard. The modified structure shall be designed to maximize the inlet efficiency and be designed and constructed in compliance with all requirements of the City of Larkspur Public Works Department.

Noise

Mitigation Measure Noise1. Project sponsor shall include in construction contracts a requirement that the construction contractor comply with the City Noise Ordinance limitations on hours of construction (Monday through Friday 7 a.m. to 6 p.m., Saturday, Sunday and legal holidays 9 a.m. to 5 p.m.), and with requirements to install intake and exhaust mufflers on construction equipment and install acoustical shields or shrouds on pavement breakers and jackhammers.

Mitigation Measure Noise2. Portable generators shall be placed on the site as far as possible from the daycare center and occupied residences, at least 200 feet away, and the contractor shall be required to obtain line power within 4 weeks of initial use of a portable generator near these uses.

Mitigation Measure Noise3. Noise insulation features shall be incorporated in the design of the proposed hotel and residential development, especially in residential buildings adjacent to East Sir Francis Drake Boulevard to reduce residents' exposure to vehicular traffic noise on this major arterial, and in residential buildings adjacent to the Sanitary District No. 1 maintenance facility to reduce residents' annoyance with noise from the adjacent facility. The construction drawings submitted to the City for review shall demonstrate conformance with this requirements and shall demonstrate that all residential buildings will meet the requirements of Goal 11 of the *Larkspur General Plan Health and Safety Element* and of California Code of Regulations Title 24 requirements specifying interior noise levels of 45 dBA or less with windows closed.

To reduce exterior noise levels in exterior activity areas to the extent feasible, for the Live/Work Row Townhouse building and the Auto-Court buildings sited closest to East Sir Francis Drake Boulevard these areas shall be located on the sides of buildings away from East Sir Francis Drake Boulevard, and for the Green Court building located adjacent to the relocated Sanitary District No 1 facility these areas shall be located on the side of the building facing away from the District building. Alternatively, the project sponsor shall develop building designs that reduce exterior noise levels in primary outdoor living spaces to 55 dBA CNEL.

Recreation

Mitigation Measure Rec1. The project sponsor shall provide two parking spaces on or adjacent to Lincoln Village Circle to allow people to park and walk up to Miwok Park.

Transportation

Mitigation Measure Trans1. The project sponsor shall contribute traffic impact fees as part of the Circulation Assessment Permit which would, in turn, provide a portion of the funds for planned improvements along Sir Francis Drake Boulevard and East Sir Francis Drake Boulevard.

Mitigation Measure Trans2. The project sponsor shall notify the Golden Gate Bridge, Highway and Transportation District (Golden Gate Transit) at least 90 days in advance of any site preparation activities that would displace ferry parking for daytime Giants baseball games or other ferry parking, to provide sufficient time for Golden Gate Transit to make alternative parking arrangements.

Mitigation Measure Trans3. To mitigate the parking shortfall for residential uses, the project sponsor shall reconfigure residential buildings and/or parking areas to meet the Larkspur Municipal Code parking requirements, reducing the total number of residential units if necessary.

Utilities and Service Systems

See Mitigation Measure WQ3 described under Section VIII, Hydrology and Water Quality. Mitigation Measure WQ3 calls for modification of the inlet structure to the 36-inch culvert crossing under East Sir Francis Drake Boulevard.