

3 REVISIONS TO THE DRAFT EIR

This chapter includes revisions to text in the DEIR. Text changes are intended to clarify or correct information in the DEIR in response to comments received on the document. Revisions are shown below as excerpts from the DEIR text, with strikethrough (~~strikethrough~~) text for deletions and underlined (underlined) text for additions. The changes appear in order to their location in the DEIR.

Volume II Table of Contents, Page v, is revised as follows:

H-2 Soil and Groundwater Sampling and Analysis Report, ENSR International 2001 Draft Removal Action Workplan, Niven Nursery, 2 Ward Street, Larkspur, California

CHAPTER 1, INTRODUCTION

Page 1-6, Table 1-1, is revised as follows:

Table 1-1 Permits and Other Required Approvals that May Use This EIR to Implement the Project		
Agency	Permit/Approval/Certification	Reason
City Council (Subsequent to review and recommendation by the Planning Commission)	Certification of the Final Central Larkspur Specific Plan EIR	To certify the Final EIR as adequate and complete review of the environmental effects of the Specific Plan.
	Approval of amendments to the General Plan and the Downtown Specific, adoption of the Central Larkspur Specific Plan, and rezoning of Subarea 3	To amend the General Plan to redesignate 16.8 acres from Low Density Residential to Low Density Residential and Parkland and revise the land Use Element and Circulation Plan, to amend the Downtown the Specific Plan to remove Subareas 1 and 2 from the Downtown Specific Plan boundaries, to adopt the Specific Plan, and to rezone Subarea 3 from L-1, Light Industrial, to P-D, Planned Development District with the Specific Plan as the Preliminary Development Plan.
City Council and Planning Commission	Certification and approval of project-specific environmental documents, as appropriate	To review project-specific elements.

Table 1-1 Permits and Other Required Approvals that May Use This EIR to Implement the Project		
Agency	Permit/Approval/Certification	Reason
	Planning approvals for individual development projects including rezone, design review, use permits, tentative and subdivision maps, historic preservation review, grading permits, and other entitlements as required by the Zoning and other City Ordinances	To ensure that subsequent development projects are reviewed by the City for their consistency with the Specific Plan.
City Department of Public Works and Engineering	Approval of stormwater drainage facilities	To ensure that development plans are in compliance with the City's storm drainage design standards.
	Approval of Erosion Control Plan	To control the potential for stormwater to erode soils and cause them to enter Larkspur Creek.
	Issuance of grading permit	To ensure that grading is conducted in compliance with the City's grading standards.
Heritage Preservation Committee	Historic preservation review	Advisory to City Planning Commission to ensure that development projects are reviewed for protection of historic resources.
State Water Resources Control Board	Storm Water Pollution Prevention Plan	Required for the discharge of stormwater from construction and developed areas that are 1 acre or larger.
California Environmental Protection Agency, Department of Toxic Substances Control	Demolition Plan approval	Required for the safe demolition of existing structures.
	Removal Action Workplan and Health and Safety Plan	Required to reduce the impact of contaminated soils.
<u>Bay Area Air Quality Management District</u>	<u>Demolition Permit</u>	<u>Required to reduce emissions of air contaminants.</u>

CHAPTER 2, PROJECT DESCRIPTION

Page 2-1, Third Paragraph is revised as follows:

Elevations within the Specific Plan area range from 7 to 22 feet above sea level, and the Specific Plan area is relatively flat except for the area just east of Magnolia Avenue, where portions of the Specific Plan area drop 7 feet in elevation in a distance of about 100 feet. Larkspur Creek is subject to tidal action and freshwater surface runoff flows. The north-western portion of Subarea 3 of the Specific Plan area is subject to flooding as a result of backup into an existing concrete ditch during extreme high tides.

Larkspur Creek is a tributary to Corte Madera Creek, located approximately 1 mile east-northeast of the Specific Plan area. The prevailing soil conditions consist of 5 to 7 feet of fill material underlain by Bay Mud.

Page 2-1, Fifth Paragraph is revised as follows:

“Historically, the Specific Plan area was occupied by the Coastal Miwok Indians, and supported ranching and farming operations in the 19th century. The Niven Nursery, in the eastern portion of the Specific Plan area, dates back to the early 1920s. The railway station and warming house were built in 1929 to replace the original Northwestern Pacific Railroad station, which was built in 1891. The building that is now the American Legion hall was built sometime before 1909.”

Page 2-5, Second Paragraph is revised as follows:

The area surrounding the Specific Plan area is completely developed, consisting of a tennis club, middle school, police station, Larkspur Boardwalk, and public park on the north side of Doherty Drive; a high school district corporation yard on the east side of Larkspur Creek; low- to medium-density residential units to the south; and downtown commercial and office uses to the southwest and west.

Page 2-15, Second and Third Paragraphs are revised as follows:

Specific Plan Land Use Policy 29 specifies that if the purchase of the affordable housing site, which may be made available for purchase by the developer of Subarea 3, is not completed within 16 months from recordation of the Final Map for Subarea 3, the site shall not thereafter be available for such purchase. In the event that the offer to purchase property for an affordable multifamily housing project is not exercised, the Larkspur General Plan’s policy requiring that at least 10% of the units be affordable would be implemented or, if applicable at the time, any new policy requirements of the update housing element.

If the multifamily housing site is developed as affordable housing, up to 85 residential units may be developed in Subarea 3. If the multifamily housing site is not purchased for affordable housing, ~~If the offer to purchase is not exercised,~~ and the affordable multifamily housing project is not developed, up to 63 market-rate units may be built, of which a minimum of 30 units would be cottage homes. In addition, affordable units would also be required, equal to at least 10% (this percentage may be increased with the update of the City’s Housing Element) of the market-rate units ($0.10 \times 63 = 7$); it is the City’s practice to round up). The maximum number of units that would be allowed if the affordable multifamily project is not developed is 70 units ($63 + 7 = 70$).

Page 2-16, Sixth Paragraph is revised as follows:

The circulation system for the Specific Plan area would be designed to facilitate traffic flow, improve safety, and incorporate a bikeway. The City has identified these

improvements for consistency with the General Plan, and they are designed to implement General Plan policies. A full consistency analysis is contained in Appendix B-2. While developers of projects within the Specific Plan area would be responsible for the payment of traffic impact fees, the City would be responsible for implementing the following improvements to Doherty Drive (the developer could be allowed to construct the improvements in lieu of paying the fee) would be improved as follows:

Page 2-19, Second Bullet Point is revised as follows:

Rezone of Subarea 3 (from L-1, Light Industrial, to P-D, Planned Development District) with the Specific Plan as the Preliminary Development Plan

Page 2-20, First Paragraph is revised as follows:

Table 2-3 shows a rate for a larger-than-average single-family home (3,000-plus square feet), based on a trip generation survey conducted by Wilbur Smith Associates, transportation consultants, in the city of Corte Madera in ~~May~~ June 2002 at Verona Place. The survey found that the sample of 7 large homes, which are in excess of 4,000 square feet each, located on a cul-de-sac, generated peak-hour trips at an overall average rate that was 30% higher than the ITE published rate. This trip generation rate is recognized to be conservative in that it is unlikely that Subarea 3 would be able to accommodate 28 lots with 4,000-plus square feet homes because of Specific Plan restrictions (i.e., 40% FAR, 0.9-acre park). Furthermore, housing units expected to be developed in Subarea 3 would be located closer to stores, services, and other commercial development. However, this trip generation rate would result in the worst-case scenario and, for the purposes of environmental analysis, the worst-case scenario is appropriate for disclosure of environmental effects that may result from the implementation of the Specific Plan.

Page 2-23, Table 2-7 is revised as follows:

	Subarea 1		Subarea 2		Subarea 3	
	<u>New</u>	<u>Total</u>	<u>New</u>	<u>Total</u>	<u>New</u>	<u>Total</u>
Single-Family (<3,000 square feet) (units)	0	<u>0</u>	0	<u>0</u>	7	<u>7</u>
Single-Family (>3,000 square feet) (units)	0	<u>0</u>	0	<u>0</u>	28	<u>28</u>
Multifamily Residential (units)	0	<u>0</u>	19	<u>19</u>	27	<u>27</u>
Cottage Residential (units)	0	<u>0</u>	0	<u>0</u>	23	<u>23</u>
Hotel/Inn (rooms)	36	<u>36</u>	0	<u>0</u>	0	<u>0</u>
Retail (square feet)	58,100 <u>6,565</u>	<u>58,100</u>	4,500	<u>67,600</u>	0	<u>0</u>

Source: Wilbur Smith Associates 2003

CHAPTER 3, EXECUTIVE SUMMARY

Page 3-3, Fourth Paragraph is revised as follows:

Doherty Park would remain in its current condition, with the possible exception of the bikeway improvements, and the American Legion hall would be retained.

Page 3-7, Last Paragraph (continues on page 3-8) is revised as follows:

When the No Project Alternative has been identified as the environmentally superior alternative, CEQA requires that an additional alternative be identified as the environmentally superior alternative in the absence of the No Project Alternative. Because the Low Density Alternative would result in reduced number and severity of impacts, it would be regarded as the environmentally superior alternative in the absence of the No Project Alternative. However, this alternative would make less of a contribution toward helping the City to meet its fair share of the regional housing need, as identified in the Housing Element of the General Plan, than would either the Proposed Project or the Residential Focus Alternative.

Pages 3-9 through 3-43, Revisions to the Executive Summary table are shown on the following pages:

**TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p>4.3-3: Soil Erosion During Construction Activities</p>	<p>PS</p>	<p><u>Prepare and Implement Stormwater Pollution Prevention Plan</u></p> <p>The City shall include the following new policy in the Specific Plan.</p> <p>New Policy: To reduce the potential for impacts on Larkspur and Corte Madera Creeks from soil erosion caused by grading and other construction activities, the developer for either public or private projects shall prepare an Erosion Control Plan for any construction activity, including those that involve less than one acre of disturbance area, to control the potential for stormwater to erode site soils and cause them to enter the creeks. The plan, which shall be in the form of a SWPPP, shall be reviewed and approved by the City and the San Francisco Bay Regional Water Quality Control Board (RWQCB) prior to the issuance of construction permits and shall be implemented during construction activities and for the next rainy season following completion of construction. The Erosion Control Plan shall comply with the City's Grading Ordinance and shall include, but shall not be limited to, the following measures:</p> <ul style="list-style-type: none"> ▶ Grading/earthmoving shall not occur during the rainy season (October 15–March 15). Should construction proceed during or shortly after wet-weather conditions at any time of year, the geotechnical engineer in the field at the time of grading/earthmoving shall provide specific wet-weather grading/earthmoving recommendations. 	<p>LTS</p>

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SUMMARY OF IMPACTS AND MITIGATION MEASURES**

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		<p>▶ A vegetated buffer shall be protected during grading/earthmoving next to Larkspur Creek. This buffer shall be at least 50 feet wide from the top of the bank on the north/south reach of the creek at the eastern edge of the Specific Plan area, and at least 25 feet wide from the top of bank on the east/west reach of the creek at the southern edge of the Specific Plan area. The conditions of all development permits within Subarea 3 and all subsequent grading permits shall both specify that before the start of any grading, orange barrier fencing shall be installed at the outer edge of the protected buffer area. The fencing shall be maintained until all construction activities have ceased. No construction activity, including the storage of construction materials, or vehicles staging or maneuvering, shall be permitted in the buffer area—<u>except those activities to implement requirements of the San Francisco Bay Regional Water Quality Control Board for water treatment and stormwater detention facilities, such as grassy swales, and to implement the native plant restoration plan for upland habitat in the buffer area, as described in Mitigation Measures 4.5-2a and 4.5-2b of the DEIR.</u></p>	<p>▶ Silt fencing and straw bales shall be used along Larkspur Creek to trap any silt flows from unvegetated ground.</p>

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SUMMARY OF IMPACTS AND MITIGATION MEASURES**

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<p>4.3-5: Damage to Underground Utilities Caused by Corrosive Soils.</p>		<p>(a) <u>Implement Mitigation Measure 4.3-4</u> <u>(a) Implement Mitigation Measure 4.3-4 Geotechnical Testing and Engineering Design Report that includes a Corrosive Soil Evaluation</u> <u>The City shall include the following new policy in the Specific Plan:</u> The City shall implement Mitigation Measure 4.3-4; Submit Geotechnical Testing and Engineering Design Report, shall require the submittal of geotechnical testing and engineering design reports that include evaluation of corrosive soils, to mitigate the potential for damage to underground utilities from corrosive soils.</p> <p>(b) <u>Backfill with Noncorrosive Soil and Use Corrosion-Resistant Materials</u> The City shall include the following new policy in the Specific Plan. New Policy: Utility line excavations shall be backfilled with noncorrosive soil backfill materials or pipelines shall be constructed of corrosion-resistant materials.</p>	
<p>4.4-6: Degradation of Groundwater Quality</p>	<p>PS</p>	<p><u>Implement Mitigation Measures 4.4-3-4.3-3 and 4.4-5</u> The City shall include the following new policy in the Specific Plan.</p>	<p>LTS</p>

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		<p>New Policy: The City shall require implementation of Mitigation Measure 4.4-34.3-3, Prepare and Implement SWPPP, and Mitigation Measure 4.4-5, Implement Groundwater Testing Program in Conjunction with Dewatering, for all development in the Specific Plan area in order to reduce the increase in pollutants conveyed to the groundwater table to a less-than-significant level and ensure that site dewatering for construction will not result in groundwater quality impacts.</p>	
<p>4.6-5: Substantial Emissions of Dust and Diesel Exhaust during Construction and Remediation</p>		<p>a) <u>Implement Control Measures to Control Dust that Includes PM10 from Construction Activities</u></p> <p>The City shall include the following new policy in the Specific Plan.</p> <p>New Policy: The City shall condition all future development permits to require implementation of effective and comprehensive dust control measures. Implementation of feasible controls, outlined below, can substantially reduce construction PM₁₀ emissions. Construction activities are also subject to BAAQMD Regulation VIII, which requires suppressing dust emissions from all sources of dust generation using water, chemical stabilizers, and/or vegetative ground cover.</p> <p>Implementing fugitive dust control measures can greatly reduce adverse impacts. According to BAAQMD, estimating the amounts of construction dust from a particular project is at best imprecise. The air district</p>	

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		<p>prefers to evaluate construction dust significance by project size and proximity to sensitive receptors. Potential adverse impacts then determine which control measures will be implemented. The Specific Plan area is near existing sensitive receptors (residences, schools) and the <u>dust generated may contain contaminants, water, etc.</u> Thus, <u>construction activities need the most stringent control measures recommended by the BAAQMD.</u> These measures, stated below, would reduce construction dust to the maximum extent feasible (by 70% or more). Therefore, the construction contractor shall implement all of the following measures:</p> <ol style="list-style-type: none"> 1. Water all active construction areas at least twice daily and more often during windy periods. Active areas adjacent to residences should be kept damp at all times. 2. Cover all hauling trucks or maintain at least 2 feet of freeboard. Pave, apply water at least twice daily, or apply (nontoxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas. 3. Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas. Sweep adjacent streets daily (with water sweepers) if visible soil material is deposited onto the road surface. 4. Hydroseed or apply (nontoxic) soil stabilizers to inactive construction areas (previously graded areas that are inactive for 10 days or more). 5. Enclose, cover, water twice daily, or apply 	

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		<p>(nontoxic) soil binders to exposed stockpiles.</p> <ol style="list-style-type: none"> 6. Limit traffic speeds on any unpaved roads to 15 mph. 7. Install sandbags or other erosion control measures to prevent silt runoff to public roadways. 8. Replant vegetation in disturbed areas as quickly as possible. 9. Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the construction site. 10. Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph. 11. Designate an air quality coordinator for the project. Prominently post a phone number for this person on the job site, and distribute same to all nearby residents and businesses. The coordinator will respond to and remedy any complaints about dust, exhaust, or other air quality concerns. A log shall be kept of all complaints and how and when the problem was remedied. 12. <u>Perform air monitoring during remediation activities. If deemed appropriate by the lead agency, DTSC, and/or BAAQMD conduct air monitoring through use of direct-reading instruments and collection of samples on the site. Prepare a Health and Safety Plan, which shall include air monitoring procedures. The Health</u> 	

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		<p><u>and Safety Plan shall be reviewed and approved by the California Department of Toxic Substance Control.</u></p> <p><u>(b) Implement All Feasible and Reasonable Control Measures to Reduce Construction Activity TACs.</u></p> <p>The City shall include the following new text and policy in the Specific Plan.</p> <p><u>Text:</u> Diesel exhaust is a major source of fine particles, as well as more than 40 substances that are listed as hazardous pollutants. The BAAQMD CEQA Guidelines recognize use of alternatively fueled construction equipment as an effective mitigation. Low-emission fuels are currently available to minimize construction equipment TAC emissions. Engine tuning and control equipment retrofit would help minimize emissions of NO_x that contributes to PM₁₀ and PM_{2.5}. 100% biodiesel fuel, called B100, reduces TAC emissions by approximately 80% to 90%. Ultra-low sulfur fossil diesel fuel (less than 15 ppm by weight) also significantly reduces PM₁₀.</p> <p>Oxidation catalysts or catalytic particulate filters are now available for many types of diesel equipment. These systems require biodiesel or CARB ultra low-sulfur diesel fuel. These systems in combination with ultra-low sulfur diesel can reduce emissions of fine particulates and toxic hydrocarbons by 90 percent or more. CARB-approved commercially available fuel additives, such as PuriNOx, reduce emissions of both NO_x and PM₁₀ by 20% to 40%,</p>	

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Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>depending on equipment. New Policy: The City shall require all onsite construction and grading equipment to implement the following three emission control techniques:</p> <ol style="list-style-type: none"> 1. Use biodiesel fuel for all onsite diesel powered equipment. For equipment with engines built in 1994 or later, B100 shall be used. In pre-1994 engines, B-20 fuel (a mixture of 20% biodiesel and 80% fossil diesel fuel) may be used if necessary. If B20 is used, the fossil diesel component should be CARB ultra low-sulfur fuel. <p align="center">OR</p> <p>Use an oxidation catalyst or catalytic particulate filter on all diesel powered equipment rated above 50 horsepower.</p> <ol style="list-style-type: none"> 2. Use PuriNOx additive or equivalent. 3. Tune vehicle engines to produce minimum NO_x, typically by engine retard of 4–8 degrees. This can reduce emissions by an additional 5%. 	
4.7-7: Construction Related Traffic	PS	<p><u>Prepare and Implement Detailed Construction Traffic Control Plan.</u></p> <p>The City shall include the following new policy in the Specific Plan: New Policy: Construction contractor(s) in the Specific Plan area shall be required to prepare a detailed construction management plan(s) prior to beginning</p>	LTS

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		<p>work within the Specific Plan area. The plans shall provide information related to duration of the construction, size of work force, average daily truck deliveries, proposed truck routes to and from the construction site, and hours/days of operation. <u>For remediation activities only, the construction management plan, which may also be a part of an Implementation Plan, shall be reviewed and approved by the California Department of Toxic Substances Control. For all construction activities, the construction management plans shall include traffic control measures specific to each construction site and vicinity; such measures may include the following:</u></p> <ul style="list-style-type: none"> ▶ Preparation and filing of a detailed construction management plan by the contractor. ▶ Provision of on-site staging area for all equipment and material deliveries ▶ Provision of on-site parking for construction work force. ▶ To the extent possible, control of delivery truck activity to off-peak periods. ▶ Use of a flag person as needed during the heaviest construction periods. ▶ <u>For remediation activities, provision of information regarding the routes to be used during transport of contaminated soil, the facility where contaminated soil is to be disposed, hours during which excavation</u> 	

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		<p><u>will occur, traffic control and loading procedures, and contingency measures in the case of spills or accidents. All transportation of contaminated soil during remediation activities shall comply with California Health and Safety Code §25160 and Title 22 of the California Code of Regulations §66263, which establish standards for the safe transportation of hazardous waste.</u></p>	
<p>4.7-9: Unacceptable Cumulative Level of Service at East Ward Street/Magnolia Avenue Intersection</p>	<p>S</p>	<p><u>Expand Mitigation Measure 4.7-2 to Add an Additional Northbound Left/Right Turn Lane at King/East Ward Street/Magnolia Avenue.</u></p> <p>A northbound left/right turn lane shall be created at this intersection with the removal of approximately two to three parking spaces from the east curb face of Magnolia Avenue located directly south of East Ward Street. Under Existing Plus Cumulative Plus Specific Plan conditions and upon completion of the proposed mitigation measure the intersection would operate acceptably at LOS C during the a.m. and p.m. peak hours. This mitigation would reduce the impacts to levels that are less than significant.</p>	<p>LTS</p>
<p>4.11-2: Potential Damage to or Destruction of Archaeological Resources</p> <p>**If archaeological resources are found in the subsurface</p>	<p>PS</p>	<p><u>(a) Implement Archaeological Testing Program</u></p> <p>The City shall include the following new policy in the Specific Plan.</p> <p><u>New Policy:</u> An archaeological subsurface testing program to delineate and define the elements of CA-MRN-68 shall be implemented before the beginning of</p>	<p>LTS</p>

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SUMMARY OF IMPACTS AND MITIGATION MEASURES**

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<p>testing program, and destruction of the archaeological resources cannot be avoided, Impact 4.1.1-2 would be considered significant and unavoidable.</p>		<p>construction<u>excavation activities or other activities that may disturb the resources.</u> The archaeologist will make a preliminary assessment of NRHP and CRHR eligibility based on the results of the testing. If CA-MRN-68 is found to be potentially eligible for listing, then destruction of this site must be avoided.</p> <p><u>(b) Monitor Construction</u></p> <p>The City shall include the following new policy in the Specific Plan.</p> <p>New Policy: A professional archaeologist, who meets the Secretary of the Interior’s Standards and Guidelines, and a Native American observer (identified through the Native American Heritage Commission) shall be present to monitor ground disturbing activities within the Specific Plan area. In the event that any archaeological resources are uncovered within the Specific Plan area during future remediation or construction activity associated with the implementation of the Specific Plan, there shall be no further excavation or disturbance of the <u>archaeological site</u> or any nearby area until the archaeologist has evaluated the find and appropriate site-specific mitigation has been identified to protect, preserve, remove, or restore the artifacts uncovered <u>consistent with CEQA §21083.2(b)(3) or (4) and CEQA Guidelines §15126.4(b)(3).</u></p>	
<p>4.12-2: Demolition-Related Release of Hazardous Materials, Including Materials Containing Lead and Asbestos</p>	<p>PS</p>	<p><u>Implement a Demolition Plan.</u></p> <p>The City shall include the following new policy in the</p>	<p>LTS</p>

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Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>Specific Plan.</p> <p>New Policy: Site surveys for the presence of potentially hazardous building materials shall be reviewed/performed, and a demolition plan for safe demolition of existing structures in Subarea 3 shall be <u>proposed by the developer and incorporated into the project prior to the issuance of construction permits and implemented during construction activities.</u> The demolition plan shall address protection of both onsite workers, offsite residents, and occupants in nearby schools from chemical and physical hazards. <u>The demolition plan shall reference, and include by this reference, all provisions of the Removal Action Plan and Healthy and Safety Plan for Subarea 3 as approved by DTSC.</u> The demolition plan shall be reviewed and approved by DTSC and the City. <u>A demolition permit shall be obtained from the Bay Area Air Quality Management District (BAAQMD), which would review the demolition plan prior to issuance of a permit.</u> All contaminated building materials shall be tested for contaminant concentrations and shall be disposed of at appropriate licensed landfill facilities. Before demolition, hazardous building materials such as peeling, chipping, and friable lead-based paint, window glazing, and building materials containing asbestos shall be removed in accordance with all applicable guidelines, laws, and ordinances. The Demolition Plan shall include a program of air monitoring for dust particulates and</p>	

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		<p>attached contaminants. Dust control and suspension of work during dry windy days shall be addressed in the Demolition Plan. Before a demolition permit is obtained from the BAAQMD, an asbestos demolition survey shall be conducted in accordance with the requirements of BAAQMD Regulation 11, Rule 2.</p> <p>The California Division of Occupational Safety and Health (DOSH) and OSHA do not define threshold limit values for lead-containing paints and, therefore, paints or coatings containing any detectable amounts of lead are regulated by these agencies' standards, if construction activities covered in the scope of these standards emit lead. The DOSH standards prescribe procedures to be followed based on anticipated exposure resulting from construction activities performed. Demolition procedures may involve potential worker exposure above the DOSH action level for lead. Therefore, the requirements of Guidelines §1532.1 must be followed. These requirements include but are not limited to the following:</p> <ul style="list-style-type: none"> ▶ Loose and peeling lead-containing paint and window glazing should be removed before building demolition. Workers conducting removal of lead paint and window glazing must receive training in accordance with Guidelines §1532.1. ▶ The lead paint and window glazing removal project should be designed by a lead project designer, project monitor, or supervisor certified by the DHS. 	

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		<ul style="list-style-type: none"> ▶ A written Lead Compliance Plan that meets the requirements of the lead construction standard must be prepared by any contractor whose actions would have an impact on lead coatings. ▶ Workers conducting removal of lead paint and window glazing must be certified by DHS in accordance with Guidelines §1532.1. ▶ Workers who may be exposed above the Action Level must have blood lead levels tested before commencement of lead work and at least quarterly thereafter for the duration of the project. Workers who are terminated from the project should have their blood lead levels tested within 24 hours of termination. ▶ A written exposure assessment must be prepared in accordance with Guidelines §1532.1. ▶ Any amount of lead waste generated, including window glazing and painted building components, must be characterized for proper disposal in accordance with Title 22, §66261.24. <p>In addition, compliance with BAAQMD Regulation 11, Rule 1, Lead, which contains procedures that limit daily emissions of lead and ensures “a person shall not discharge an emission of lead, or compound of lead calculated as lead, that will result in ground level concentrations in excess of 1.0 µg/m³ averaged over 24 hours.” This regulation required calculations of and</p>	

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<p>4.12-3: Exposure to Hazardous Materials during Removal of Contaminated Soil</p>	<p>PS</p>	<p>monitoring of lead concentrations to ensure compliance.</p> <p>Implement Removal Action Workplan and Health and Safety Plan.</p> <p>The City shall include the following new policy in the Specific Plan.</p> <p>New Policy: The RAW developed for Subarea 3, under the oversight of DTSC, shall be incorporated into the project prior to the issuance of construction permits and implemented during construction activities. The workplan includes provisions for safe removal, transportation, and disposal of selected contaminated soil from Subarea 3. Removal of contaminated soils from the areas identified would reduce the cancer risk to less than <u>24</u> in 1 million. <u>In compliance with the RAW approved by DTSC,</u> Clean fill shall also be placed over much of Subarea 3, further reducing the potential for exposure of people to residual soil contamination. A detailed Health and Safety Plan shall be prepared to address measures to protect workers and the community during remedial activities, and shall be reviewed and approved by DTSC.</p>	<p>LTS</p>
<p>4.12-6: Potential Contamination of Soils Near Redwood High School, San Andreas High School, and Hall Middle School</p>	<p>PS</p>	<p>Implement Demolition Plan and Removal Action Workplan.</p> <p>The City shall include the following new policy in the Specific Plan.</p> <p>New Policy: The proposed hazardous materials remediation plans and actions for Subarea 3 shall be implemented to reduce the overall risk to students at the</p>	<p>LTS</p>

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SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>nearby Redwood High School and Hall Middle School. During the demolition and remediation process, special measures shall be taken in accordance with an approved Demolition Plan and RAW to contain and remove potentially hazardous substances and wastes under controlled conditions. <u>The developer shall prepare and submit these plans, which must be approved by the City prior to the issuance of construction permits, shall address approved routes, truck cleaning and inspection, and contingencies for addressing spills and other accidents. The details of approved truck routes, truck cleaning and inspection, and contingencies in case of spills or accidents shall be addressed in an Implementation Plan that is to be reviewed and approved by DTSC prior to remediation of Subarea 3. The Implementation Plan shall include a Health and Safety Plan, Transportation Plan and Contingency Plan in accordance with Title 8 of the California Code of Regulations section 5192, California Health Safety Code Section 25160 and Title 22 of the California Code of Regulations Section 66236 to assure that all remediation activities are protective of human health and the environment.</u></p>	

SECTION 4.1, LAND USE/PLANS AND POLICIES

Page 4.1-8, Last paragraph, last two sentences are revised as follows:

As a part of the approval process ~~Upon approval of the Specific Plan for future planned development projects in Subarea 3,~~ Subarea 3 would be rezoned from L-1 Light Industrial to Planned Development with the Specific Plan as the Preliminary Development Plan. The Planned Development zone would be consistent with the residential uses and the public park that the Specific Plan designated for Subarea 3.

The text on DEIR Page 4.1-10 is revised as follows:

- ▶ **Pedestrian and Bicycle Routes.** The regional bikeway will remain along the NWP right-of-way. A new route shall be added that will be a Class 1 path through the Specific Plan area, and a Class 2 path through Larkspur Plaza Drive north of Doherty Drive connecting with the existing Class 1 path in the Creekside development. A new alignment to the regional bikeway, designed to Class I bike path standards, would be added.

Page 4.1-12, Second Paragraph is revised as follows:

The Bicycle/Pedestrian Circulation Plan in the General Plan identifies bike routes in the city, including those within or adjacent to the Specific Plan boundary. The Specific Plan includes the provision of a Class I bike path in the former railroad right-of-way in Subarea 1. Also, a bikeway would be provided along the ~~west~~ east side of Larkspur Creek. While the Class 2 bike path proposed under the Specific Plan along Larkspur Plaza Drive and the Class 1 paths proposed on the south side of Doherty Drive and ~~west~~ east of Larkspur Creek are not identified in the Bicycle/Pedestrian Circulation Diagram (General Plan Figure 8-2), they are consistent with Policies a, d, e, k, and l in the Bicycle and Pedestrian Trails and Paths chapter of the General Plan. The proposed changes to Figure 8-2 would make the proposed bike paths fully consistent with the General Plan.

SECTION 4.3, GEOLOGY AND SOILS

Page 4.3-13 Last Paragraph is revised as follows:

The Specific Plan area is located on a flat, relatively level area with cohesive fill and native soils; as such, soil erosion occurs infrequently on most of the Specific Plan area. However, Larkspur Creek runs along the southern and eastern boundaries of the Specific Plan area, and erosion of soils during construction activities could potentially affect the creek in those areas. Soils loosened, exposed, and stored in piles during construction in the vicinity of Larkspur Creek could potentially become mobilized by stormwater during construction activities. Such uncontrolled soil erosion could potentially affect the creek by adding to its sediment load. Because Larkspur Creek is a

tributary of Corte Madera Creek, the amount of sediment in Corte Madera Creek could also increase as a result. The potential for soil erosion would be reduced if construction and remediation activities occur outside the rainy season; however, storm events may occur year-round and, thus, soil erosion could occur anytime during the year. The City reviews certain types of projects, including those that may be constructed in the Specific Plan area, for compliance with the City's Grading Ordinance and the Subdivision Code (see Section 4.4, Hydrology and Water Quality, for additional information). In compliance with the federal Clean Water Act, (CWA) the City requires the submission of Stormwater Pollution Prevention Plan (SWPPP) for all construction activities involving more than 1 acre of land. The SWPPP, which must be prepared before the issuance of Building Permits and prior to the commencement of construction activities, will include specifications for best management practices (BMPs) that will be implemented during project construction to minimize runoff from the construction areas, including storage and maintenance areas and building materials handling areas.

Page 4.3-18, second bullet point in Mitigation Measure 4.3-3 is revised as follows:

- ▶ A vegetated buffer shall be protected during grading/earthmoving next to Larkspur Creek. This buffer shall be at least 50 feet wide from the top of the bank on the north/south reach of the creek at the eastern edge of the Specific Plan area, and at least 25 feet wide from the top of bank on the east/west reach of the creek at the southern edge of the Specific Plan area. The conditions of all development permits within Subarea 3 and all subsequent grading permits shall both specify that before the start of any grading, orange barrier fencing shall be installed at the outer edge of the protected buffer area. The fencing shall be maintained until all construction activities have ceased. No construction activity, including the storage of construction materials, or vehicles staging or maneuvering, shall be permitted in the buffer area- except those activities to implement requirements of the San Francisco Bay Regional Water Quality Control Board for water treatment and stormwater detention facilities, such as grassy swales, and to implement the native plant restoration plan for upland habitat in the buffer area, as described in Mitigation Measures 4.5-2a and 4.5-2b of the DEIR.

Page 4.3-18 subparagraph (a) is revised as follows:

Damage to Underground Utilities Caused by Corrosive Soils.

(a) ~~Implement Mitigation Measure 4.3-4 Geotechnical Testing and Engineering Design Report that includes a Corrosive Soil Evaluation~~

The City shall include the following new policy in the Specific Plan:

The City ~~shall implement Mitigation Measure 4.3-4, Submit Geotechnical Testing and Engineering Design Report,~~ shall require the submittal of geotechnical testing and

engineering design reports that include evaluation of corrosive soils, to mitigate the potential for damage to underground utilities from corrosive soils.

SECTION 4.4, HYDROLOGY AND WATER QUALITY

Page 4.4-6 First Paragraph is revised as follows:

A small portion of the Specific Plan area, in and adjacent to the concrete drainage ditch located in the north-western part of the site portion of Subarea 3 (Exhibit 4.4-2), appears to be subject to tidal flooding during extreme tide events. This flood hazard is not shown on the FIRM map (Exhibit 4.4-1), but is hypothesized based on the storm drainage configuration and observations of flooding at high tide by persons familiar with the Specific Plan area. The ditch was observed by PWA staff to drain to a culvert under Doherty Drive, which then appears to be routed to an ungated outfall into a tidal channel, which connects to Corte Madera Creek. A nursery employee stated that extremely high tides “back up” in the concrete ditch, causing local flooding. Winter storm runoff may also contribute (see below).

Page 4.4-21, Mitigation Measure 4.4-6:

Implement Mitigation Measures ~~4.4-3~~ 4.3-3 and 4.4-5

The City shall include the following new policy in the Specific Plan.

New Policy: The City shall require implementation of Mitigation Measure ~~4.4-3~~ 4.3.3, Prepare and Implement SWPPP, and Mitigation Measure 4.4-5, Implement Groundwater Testing Program in Conjunction with Dewatering, for all development in the Specific Plan area in order to reduce the increase in pollutants conveyed to the groundwater table to a less than significant level and ensure that site dewatering for construction will not result in groundwater quality impacts.

SECTION 4.6, AIR QUALITY

Page 4.6-11, the first two full paragraphs are revised as follows:

Impact
4.6-5

Substantial Emissions of Dust and Diesel Exhaust during Construction and Remediation. *Dust generated by construction equipment and vehicles could be substantial, and could contribute to ambient PM_{10} . Construction equipment could also emit substantial amounts of diesel exhaust, which has been identified as a TAC. This impact is considered **potentially significant**.*

Construction and grading can create substantial amounts of dust. Once existing buildings within the Specific Plan area have been demolished, dust generated by construction equipment and vehicles could be significant. Fugitive dust is emitted during grading, trenching, and paving, and from wind erosion of exposed earth surfaces. Dirt tracked out onto nearby paved roads can be re-entrained into the

atmosphere by passing vehicles and contribute to ambient PM₁₀. In addition, contaminant-bearing dust may be generated during the site remediation phase of the construction activities.

Page 4.6-14 Third full paragraph is revised as follows:

Implementing fugitive dust control measures can greatly reduce adverse impacts. According to BAAQMD, estimating the amounts of construction dust from a particular project is at best imprecise. The air district prefers to evaluate construction dust significance by project size and proximity to sensitive receptors. Potential adverse impacts then determine which control measures will be implemented. The Specific Plan area is near existing sensitive receptors (residences, schools) and the dust generated may contain contaminants. ~~would, t~~ Thus, construction activities need the most stringent control measures recommended by the BAAQMD. These measures, stated below, would reduce construction dust to the maximum extent feasible (by 70% or more). Therefore, the construction contractor shall implement all of the following measures:

Page 4.6-15 is revised as follows: Insert after item 11 of the numbered list:

12. Perform air monitoring during remediation activities. If deemed appropriate by the lead agency, DTSC, and/or BAAQMD conduct air monitoring through use of direct-reading instruments and collection of samples on the site. Prepare a Health and Safety Plan, which shall include air monitoring procedures. The Health and Safety Plan shall be reviewed and approved by the California Department of Toxic Substance Control.

SECTION 4.7, TRAFFIC AND CIRCULATION

Page 4.7-6, First Full Paragraph and Table 4.7-1 are revised as follows:

Saturday ADT volumes were lower than weekday volumes. Magnolia Avenue Downtown had 17% fewer vehicles on Saturday while Doherty Drive had almost 30% lower volumes. Overall, ADT volumes have decreased by just over ~~20~~17% on Magnolia Avenue compared to 1999 ADT data. ADT volumes on Doherty Drive have shown a modest 4% increase during weekdays and a decrease of 9% on weekends compared to 1999 ADT volumes. The overall decrease in daily vehicle traffic is most likely attributed to overall economic conditions, which have slowed over the past few years.

Table 4.7-1 Summary and Comparison of Average Daily Traffic Volumes		
Location	Weekday ADT (vehicles)	Saturday ADT (vehicles)
1999—Magnolia Downtown	15,680	12,940
2003—Magnolia Downtown	12,880	10,716
Percent Change	-22 -17.8	-21 -17.2
1999—Doherty Drive	11,410	8,990
2003—Doherty Drive	11,860	8,240
Percent Change	4	-9

Source: Marks Traffic Data Service 2003

Page 4.7-12, Fourth Full Paragraph is revised as follows:

Scheduled transit service in Larkspur is provided by Golden Gate Transit and includes local and regional bus service between the North Bay and San Francisco, and ferry service to San Francisco. Bus stops located on Magnolia Avenue near Ward Street provide the nearest access to bus services from the Specific Plan area. Ferries depart from the Larkspur Ferry Terminal, and are serviced by ferry shuttle buses (free for ferry passengers).

Page 4.7-15, Fourth Full Paragraph is revised as follows:

Surveys of crosswalk activity at Hall Middle School and Redwood High School were conducted during the weekday morning and afternoon peak periods in May 2003. Results of the pedestrian counts are shown in Table 4.7-3. Hall Middle School typically is in session between 8:40 a.m. and 3:10 p.m. Monday through Friday with the exception of Wednesdays when classes are held from 9:00 a.m. to 3:10 p.m. Redwood High School starts at 8:00 a.m. and typically finishes at 3:10 p.m., with the exception of Thursdays when school ends at approximately 1:15 p.m. Table 4.7-3 shows volumes for 20-minute time periods. The volumes for the two high school crosswalks are combined. The crosswalk located at Lucky Drive and the back parking lot carries approximately 70% of the high school crosswalk activity.

Pages 4.7-18, Last Two Paragraphs, and 4.7-19, First Paragraph, and Table 4.7-5 are revised as follows:

Table 4.7-5 shows a summary of vehicle trip generation rates used in the assessment of the Specific Plan. The rates used are based on the ITE *Trip Generation*, 6th Edition (ITE 1997), and field surveys (~~May~~June 2002) of large (4,000~~0~~3,000-plus square feet) single-family homes. The ITE publication does not differentiate between large-~~sized~~ ~~lot~~ and standard-~~sized~~ ~~lot~~ single-family uses, nor does it provide trip generation rates for cottage and mixed-use residential land uses.

In order to gauge the potential traffic impact of the ~~large-sized-lot~~ single-family homes (greater than 3,000 square feet) that are likely to be built where permitted due to market conditions, Wilbur Smith Associates conducted a 2-day field study of trip generation associated with single-family residential units that are 3,000 square feet or more (e.g., large homes in Corte Madera that are 4,000-plus square feet in size). The 7 study homes are located on a cul-de-sac, Verona Place, off Paradise Road east of U.S. 101. Vehicle trips traveling to and from the cul-de-sac were recorded on two consecutive weekdays during the 7:00 a.m. to 9:00 a.m. morning peak period and the 4:00 p.m. to 6:00 p.m. evening peak period.

**Table 4.7-5
Summary of Specific Plan Vehicle Trip Rates**

Land Use	Vehicle Trip Generation Rates		
	A.M. Peak Hour	P.M. Peak Hour	Daily
Large-sized-lot Single-Family (unit)	1.10	1.52	14.3
Single-Family Homes (unit)	0.75	1.01	9.57
Multifamily Homes (unit)	0.56	0.76	7.18
Cottage Homes (unit)	0.56	0.76	7.18
Specialty Retail (1,000 SF)	1.03	2.59	40.67
Office (1,000 SF)	1.56	1.49	11.01
Hotel/Inn (room)	0.56	0.61	8.23
Community Center (1,000 SF)	1.32	1.75	22.88

Source: Institute of Transportation Engineers 1997, Wilbur Smith Associates Surveys (June 2002); Wilbur Smith Associates 2003.

Page 4.7-25, Table 4.7-9 is revised as follows:

Table 4.7-9					
Specific Plan Share of Existing and Future Peak Hour Intersection Volumes					
Intersections	Existing Plus Specific Plan	Specific Plan Volume	Specific Plan Percent	Existing Plus Cumulative Plus Specific Plan	Specific Plan Percent
a.m. Peak Hour					
3. East Ward Street/Magnolia Avenue	1,412	105	7.4	1,707	6.2
4. King Street/Magnolia Avenue	1,445 1,129	53 43	3.7 3.8	1,369 1,359	3.9 3.2
7. Doherty Drive/Riviera Circle	1,347	59	4.4	1,677	3.5
10. Fifer Avenue /Tamal Vista Boulevard	1,679	59	3.5	2,150	2.7
11. Wornum Drive /Tamal Vista Boulevard	1,206	21	1.7	1,623	1.3
5. Doherty Drive/Larkspur Plaza	1,217	79	6.5	1,561	5.1
6. Doherty Drive/Piper Park	1,128	63	5.6	1,450	4.3
p.m. Peak Hour					
3. East Ward Street/Magnolia Avenue	1,714	223	13.0	1,995	11.2
4. King Street/Magnolia Avenue	1,181	79	6.7	1,397	5.7
7. Doherty Drive/Riviera Circle	1,584	99	6.3	1,822	5.4
10. Fifer Avenue /Tamal Vista Boulevard	1,745	99	5.7	2,115	4.7
11. Wornum Drive /Tamal Vista Boulevard	1,650	55	3.3	2,057	2.7
5. Doherty Drive/Larkspur Plaza	1,295	125	9.7	1,551	8.1
6. Doherty Drive/Piper Park	1,153	111	9.6	1,433	7.7
Source: Wilbur Smith Associates (2003)					

Page 4.7-34, Last Two Paragraphs are revised as follows:

Impact
4.7-7

Construction-Related Traffic. *During the construction phase of future development projects, roadway closure and construction vehicle trips would potentially cause traffic interruption and may result in unsafe conditions for drivers, passengers, bikers, and pedestrians. While the City Code requires traffic control during construction activities it does not define the specific measures that would ensure human safety and convenience. This is a **potentially significant** impact.*

With the exception of remediation activities, specific information on construction activities that may occur within the Specific Plan area is currently not available. Pursuant to RAW, site remediation would require the excavation and offsite disposal of approximately 900 cubic yards of contaminated soil. Clean fill would be brought to Subarea 3 to backfill excavation areas. An estimated 100 truck trips would be needed to transport contaminated soil from and clean fill to Subarea 3 over a period of one to two weeks. In addition, remediation activities would generate trips by workers and visitors. Other construction-related activities would typically occur Monday through Friday from 7:00 a.m. to 5:00 p.m. Specifications would include restrictions on noise and dust, and construction activities would be strictly monitored due to the proximity of schools

and businesses in the area. Construction staging and storage of equipment and materials would likely occur on the construction sites. It is not anticipated that any traffic lanes or sidewalks on either Magnolia Avenue or Doherty Drive would need to be closed during the construction duration. However, if construction activities were to result in the extended, temporary closure

Page 4.7-39, Table 4.7-13, is revised as follows:

Table 4.7-13								
Existing Plus Cumulative (No Specific Plan) and Existing Plus Cumulative Plus Specific Plan								
Conditions Intersection Level of Service								
Intersections	Existing Plus Cumulative (No Specific Plan)				Existing Plus Cumulative Plus Specific Plan			
	a.m. Peak Hour		p.m. Peak Hour		a.m. Peak Hour		p.m. Peak Hour	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
Signalized Intersection (LOS A-D are acceptable)								
1. Bon Air Road/Magnolia Avenue	B	9.3	B	11.4	B	9.3	B	11.6
2. Doherty Drive/Magnolia Avenue	B	12.1	B	14.4	B	12.7	C	18.0
3. East Ward Street/Magnolia Avenue	F	**	F	**	F	**	F	**
10. Fifer Avenue /Tamal Vista Boulevard	C	23.5	E	57.1	B	6.4	B	10.3
11. Wornum Drive /Tamal Vista Boulevard***	C	25.1	F	70.5	D	26.3	F	81.2
12. Wornum Drive/Redwood Highway	B	8.4	B	12.6	B	8.5	B	12.8
13. 101 NB On-Ramp/Industrial	B	5.6	C	17.8	B	5.6	C	18.1
Unsignalized Intersection (LOS A-C are acceptable)								
4. King Street/Magnolia Avenue	E	30.9	F	**	E	34.5	F	**
5. Doherty Drive/Larkspur Plaza*	F	52.2	E	43.2	B*	6.9	B*	9.1
6. Doherty Drive/Piper Park****	D	24.1	C	19.6	D	25.8	D	21.8
7. Doherty Drive/Riviera Circle	E	36.6	E	41.1	E	40.0	E	44.9
8. Lucky Drive/Doherty Drive	C	12.8	<u>BC</u>	<u>9.2</u> <u>10.7</u>	C	<u>14.6</u> <u>15.1</u>	<u>BC</u>	<u>9.5</u> <u>13.6</u>
9. Lucky Drive/Fifer Avenue	C	12.1	C	14.1	C	12.2	C	15.5
Notes: Delay is in average seconds per vehicle LOS = Level of Service * Assumes intersection would be signalized with implementation of Specific Plan. ** Exceeds 120 seconds delay *** The improvement of the intersection of Wornum Drive/Tamal Vista Boulevard has been under construction and may be completed by the end of 2003. **** Assumes no signalization improvements under either scenario. Bold = unacceptable operations NA = Not available Source: Wilbur Smith Associates (May 2003)								

Page 4.7-43, First Paragraph and Bullets immediately following are revised as follows:

New Policy: Construction contractor(s) in the Specific Plan area shall be required to prepare a detailed construction management plan(s) prior to beginning work within the Specific Plan area. The plans shall provide information related to duration of the construction, size of work force, average daily truck deliveries, proposed truck routes to and from the construction site, and hours/days of operation. For remediation activities only, the construction management plan, which may also a part of an Implementation Plan, shall be reviewed and approved by the California Department of Toxic Substances Control. For all construction activities, tThe construction management plans shall include traffic control measures specific to each construction site and vicinity; such measures may include the following:

- ▶ Preparation and filing of a detailed construction management plan by the contractor.
- ▶ Provision of on-site staging area for all equipment and material deliveries
- ▶ Provision of on-site parking for construction work force.
- ▶ To the extent possible, control of delivery truck activity to off-peak periods.
- ▶ Use of a flag person as needed during the heaviest construction periods.
- ▶ For remediation activities, provision of information regarding the routes to be used during transport of contaminated soil, the facility where contaminated soil is to be disposed, hours during which excavation will occur, traffic control and loading procedures, and contingency measures in the case of spills or accidents. All transportation of contaminated soil during remediation activities shall comply with California Health and Safety Code §25160 and Title 22 of the California Code of Regulations §66263, which establish standards for the safe transportation of hazardous waste.

Page 4.7-43, Mitigation Measure 4.7-9 is revised as follows:

Impact
4.7-9
mitigation

Unacceptable Cumulative Level of Service at East Ward Street/Magnolia Avenue Intersection.

Expand Mitigation Measure 4.7-2 to Add an Additional Northbound Left/Right Turn Lane at King East Ward Street/Magnolia Avenue.

A northbound ~~Left/right~~-turn lane shall be created at this intersection with the removal of approximately two to three parking spaces from the east curb face of Magnolia Avenue located directly south of East Ward Street. Under Existing Plus Cumulative Plus Specific Plan conditions and upon completion of the proposed mitigation measure the intersection would operate acceptably at LOS C during the a.m. and p.m. peak hours. This mitigation would reduce the impacts to levels that are less than significant.

SECTION 4.9, PUBLIC SERVICES AND UTILITIES

Page 4.9-1, Table 4.9-1 is revised as follows:

School	Grades	Enrollment	Capacity	Difference
Neil Cummins Elementary School	K-5	634*	701*	-60
		647*	724*	-77
Henry C. Hall Middle School	6-8	316*	391*	-75
		347*	456*	-109
Redwood High School	9-12	1,446	1,900	-454

*School district-estimated capacity numbers.
Sources: Toukonen, pers. comm., 2003; Winkler, pers. comm., 2003 Comment Letter, February 12, 2004

Page 4.9-6, Second full paragraph:

~~The Larkspur School District estimated that an additional 60 students would be able to attend Neil Cummins Elementary School and 75 students would be able to attend Hall Middle School (Winkler, pers. comm., 2003). As shown in Table 4.9-1, Neil Cummins Elementary School has capacity for additional 77 students and Henry C. Hall Middle School has capacity for additional 109 students.~~ As shown in Table 4.9-2, the maximum residential development permitted in the Specific Plan area is anticipated to add up to 50 elementary and middle school students. The resulting enrollment would be less than the estimated student capacity, and no new school facilities would be required in order to serve the development that would be in the Specific Plan area. The Larkspur School District is currently conducting a demographic study to assess whether its existing facilities are sufficient to accommodate projected increases in enrollment. It has given notice to end the lease of San Clemente School, which the Larkspur School District currently owns and leases to a private school. With the end of the lease, Larkspur School District would have additional capacity to accommodate new students. No newly constructed school facilities would be needed to serve new development in the Specific Plan area. Therefore, no physical impacts associated with the construction or expansion of school facilities in the Larkspur School District would occur as a result of development under the Specific Plan.

SECTION 4.10, VISUAL QUALITY AND AESTHETICS

Page 4.10-7, Fourth and Fifth Paragraphs are revised as follows:

Policy 9. Creek Resources. Protect and enhance the natural and scenic values of Larkspur Creek and ~~make the creekside corridor accessible for passive use by the entire community.~~ (Require that permanent fencing be installed along the outside edge of the buffer to discourage people and their pets from entering the restored creekside habitat.

Passive community use may instead be established near the Larkspur Creek corridor but not within the buffer area.)

Policy 10. Open Space Network. Integrate the area’s major natural elements (the creek, creekside vegetation, and heritage trees) with a system of pedestrian and bicycle routes to define the entire area visually and tie the individual parcels together into a site-wide open space network. Prohibit pedestrian and bicycle paths from being located within the Larkspur Creek buffer and require that permanent fencing be installed along the outside edge of the buffer to discourage people and their pets from entering the restored creekside habitat. Pedestrian and bicycle routes may be established near the Larkspur Creek corridor but not within the buffer area.)

SECTION 4.11, CULTURAL RESOURCES

Page 4.11-5, the last sentence in the first paragraph is deleted as follows:

More extensive testing, to be done by Holman & Associates at the request of the City, will take place before the Final EIR is completed to refine information regarding spatial extent, content, and NRHP or CRHR eligibility of the deposits.

Page 4.11-5, Last Paragraph (and continuing to Page 4.11-6) is revised as follows:

“The buildings that once housed the Northwestern Pacific Railroad station and warming house located in the southwestern portion of the Specific Plan area were built in 1929 to replace the original Northwestern Pacific Railroad station, which was built in 1891, and were used to support railroad operations until the station was closed in 1941.”

Page 4.11-10, Mitigation Measure 4.11-2a is revised as follows:

Impact
4.11-2a, b
mitigation

Potential Damage to or Destruction of Archaeological Resources.

(a) Implement Archaeological Testing Program

The City shall include the following new policy in the Specific Plan.

New Policy: An archaeological subsurface testing program to delineate and define the elements of CA-MRN-68 shall be implemented before the beginning of ~~construction~~ excavation activities or other activities that may disturb the resources. The archaeologist will make a preliminary assessment of NRHP and CRHR eligibility based on the results of the testing. If CA-MRN-68 is found to be potentially eligible for listing, then destruction of this site must be avoided.

Page 4.11-11, First Paragraph, Second Sentence is revised as follows:

In the event that any archaeological resources are uncovered within the Specific Plan area during future remediation or construction activity associated with the

implementation of the Specific Plan, there shall be no further excavation or disturbance of the archaeological site or any nearby area until the archaeologist has evaluated the find and appropriate site-specific mitigation has been identified ~~to protect, preserve, remove, or restore the artifacts uncovered~~ consistent with CEQA §21083.2(b)(3) or (4) and CEQA Guidelines §15126.4(b)(3).

Page 4.11-12. Last Paragraph is revised as follows:

Following implementation of the above mitigation measures, Impacts ~~4.11-2 and 4.11-3~~ would remain significant and unavoidable. Following implementation of the above mitigation measures, Impacts 4.11-2 would remain significant and unavoidable if archaeological resources are found in the subsurface testing program, and destruction of the archaeological resources cannot be avoided. Otherwise Impact 4.11-2 would be less than significant with the implementation of the mitigation measure. If human remains are found during construction, and development of the site cannot be avoided, then Impact 4.11-5 would also remain significant and unavoidable. These impacts would also constitute a considerable contribution to cumulative cultural resources impacts.

SECTION 4.12, HAZARDS AND HAZARDOUS MATERIALS

Page 4.12-6 Second Paragraph is revised as follows:

Based on the review of the Health Based Risk Assessment, DTSC required that portions of the Niven Nursery site be remediated by the removal of contaminated soil to reduce the health risk to an acceptable level. A Removal Action Workplan (RAW) was then developed for the site (ENSR International 2002) to specify the areas requiring soil remediation and the extent of soil removal necessary. A RAW is a remedy selection document that can be prepared for a hazardous substance release pursuant to California Health and Safety Code §25356. It is prepared when a nonemergency action or remedial action is projected to cost less than \$1 million. A draft of the RAW was submitted to DTSC for review and comment, and the document was updated with respect to the review. As part of the process of finalizing the RAW, DTSC must comply with CEQA, and intends to use this EIR for that purpose. ~~A preliminary draft of this Revised Draft EIR was reviewed by DTSC, and their comments were incorporated into the document.~~ The various steps taken in the investigation, evaluation, and proposed remediation of the Niven Nursery site (Subarea 3) are described below under Environmental Site Investigations and Assessments.

Page 4.12-12 First Paragraph under Health-Based Risk Assessment heading is revised as follows:

ENVIRON performed a human health risk assessment (ENVIRON 2002) (Appendix H-3H-5) to determine whether the development of Subarea 3 would pose any risk to the health of people expected to be living and working at the site under a future residential land redevelopment scenario. Soils, sediment, and groundwater samples

were analyzed; the risk assessment methods and assumptions used were developed or recommended by Cal/EPA and EPA for use when residential land use is anticipated.

Page 4.12-21, First Paragraph, First Sentence is revised as follows:

Shallow groundwater may be encountered in excavations for remedial activities and for utilities and foundations during construction in Subarea 3, necessitating dewatering.

Page 4.12-24, First Paragraph is revised as follows:

New Policy: Site surveys for the presence of potentially hazardous building materials shall be reviewed/performed, and a demolition plan for safe demolition of existing structures in Subarea 3 shall be proposed by the developer and incorporated into the project prior to the issuance of construction permits and implemented during construction activities. The demolition plan shall address protection of both onsite workers, offsite residents, and occupants in nearby schools from chemical and physical hazards. The demolition plan shall reference, and include by this reference, all provisions of the Removal Action Plan and Healthy and Safety Plan for Subarea 3 as approved by DTSC. The demolition plan shall be reviewed ~~and approved~~ by DTSC and the City. A demolition permit shall be obtained from the Bay Area Air Quality Management District (BAAQMD), which would review the demolition plan prior to issuance of a permit. All contaminated building materials shall be tested for contaminant concentrations and shall be disposed of at appropriate licensed landfill facilities. Before demolition, hazardous building materials such as peeling, chipping, and friable lead-based paint, window glazing, and building materials containing asbestos shall be removed in accordance with all applicable guidelines, laws, and ordinances. The Demolition Plan shall include a program of air monitoring for dust particulates and attached contaminants. Dust control and suspension of work during dry windy days shall be addressed in the Demolition Plan. Before a demolition permit is obtained from the BAAQMD, an asbestos demolition survey shall be conducted in accordance with the requirements of BAAQMD Regulation 11, Rule 2.

Page 4.12-25, Text Following the Third Bullet is revised as follows:

Impact
4.12-3
mitigation

Exposure to Hazardous Materials during Removal of Contaminated Soil.

Implement Removal Action Workplan and Health and Safety Plan.

The City shall include the following new policy in the Specific Plan.

New Policy: The RAW developed for Subarea 3, under the oversight of DTSC, shall be incorporated into the project prior to the issuance of construction permits and implemented during construction activities. The workplan includes provisions for safe removal, transportation, and disposal of selected contaminated soil from Subarea 3. Removal of contaminated soils from the

areas identified would reduce the cancer risk to less than 2 in 1 million. In compliance with the RAW, approved by DTSC, Clean fill shall also be placed over much of Subarea 3, further reducing the potential for exposure of people to residual soil contamination. A detailed Health and Safety Plan shall be prepared to address measures to protect workers and the community during remedial activities, and shall be reviewed and approved by DTSC.

Page 4.12-26, Last Sentence of the New Policy in Mitigation Measure 4.12-6 is revised as follows:

The developer shall prepare and submit (These plans, which must shall be approved by the City prior to the issuance of construction permits. , shall address approved routes, truck cleaning and inspection, and contingencies for addressing spills and other accidents. The details of approved truck routes, truck cleaning and inspection, and contingencies in case of spills or accidents shall be addressed in an Implementation Plan that is to be reviewed and approved by DTSC prior to remediation of Subarea 3. The Implementation Plan shall include a Health and Safety Plan, Transportation Plan and Contingency Plan in accordance with Title 8 of the California Code of Regulations section 5192, California Health Safety Code Section 25160 and Title 22 of the California Code of Regulations Section 66236 to assure that all remediation activities are protective of human health and the environment

CHAPTER 6, ALTERNATIVES

Page 6-6, Table 6-2 is revised as follows:

Intersections	Existing Plus Cumulative Plus Proposed Project				Existing Plus Cumulative Plus No Project Alternative			
	A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
1. Bon Air Road/Magnolia Avenue	B	9.3	B	11.6	B	9.3	B	11.4
2. Doherty Drive/Magnolia Avenue	B	12.7	C	18.0	B	12.1	B	14.4
3. East Ward Street/Magnolia Avenue	F	**	F	**	F	**	F	**
4. King Street/Magnolia Avenue	E	34.5	F	**	E	30.9	F	**
5. Doherty Drive/Larkspur Plaza	B	6.9	B	9.1	F	52.2	E	43.2
6. Doherty Drive/Piper Park***	D	25.8	D	21.8	D	24.1	C	19.6
7. Doherty Drive/Riviera Circle	E	40.0	E	44.9	E	36.6	E	41.1
8. Lucky Drive/Doherty Drive	C	<u>14.6</u> <u>15.1</u>	<u>BC</u>	<u>9.5</u> <u>13.5</u>	C	12.8	<u>BC</u>	<u>9.2</u> <u>10.7</u>
9. Lucky Drive/Fifer Avenue	C	12.2	C	15.5	C	12.1	C	14.1
10. Fifer Avenue/Tamal Vista Boulevard	C	24.4	F	74.4	C	23.5	E	57.1

Table 6-2 Intersection Levels of Service: Proposed Project Versus No Project Alternative								
Intersections	Existing Plus Cumulative Plus Proposed Project				Existing Plus Cumulative Plus No Project Alternative			
	A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
11. Wornum Drive/Tamal Vista Boulevard****	D	26.3	F	81.2	C	25.1	F	70.5
12. Wornum Drive/Redwood Highway	B	8.5	B	12.8	B	8.4	B	12.6
13. 101 Northbound On-ramp/Industrial	B	5.6	C	18.1	B	5.6	C	17.8
Notes: Delay is in average seconds per vehicle LOS = Level of Service ** = exceeds 120 seconds delay *** = Assumes no improvement change (e.g., addition of driveway from Specific Plan area) to Doherty Drive/Piper Park intersection would be implemented under both the Proposed Project Alternative and the No Project Alternative. **** = The improvement to the intersection of Wornum Drive/Tamal Vista Boulevard has been under construction and may be completed by the end of 2003. Bold = unacceptable operations								

Page 6-9, First Paragraph is revised as follows:

This alternative would enable the development of the Specific Plan area at considerably lower residential and commercial densities than anticipated under the Proposed Project, with a higher proportion of detached, single-family homes and less clustering of housing units. Under this alternative, Subarea 1 could support up to 12 multifamily apartment units, including up to six new multifamily apartment units above commercial uses. Subarea 1 could also support 9,900 square feet of new retail development and a smaller, 20-room hotel. An additional 4,500 square feet of retail development is assumed to be developed in Subarea 2, but no residential units would be developed in this subarea. Subarea 3 would support 45 residential units and a 10,000-square-foot community center. The residential unit mix in this subarea under the Low Density Alternative is composed of 30 large single-family homes, 10 standard single-family homes, five cottage homes, and no multifamily apartment units. All Specific Plan policies and standards are assumed to remain as proposed. All Specific Plan policies and requirements related to the maintenance of adequate creek setbacks, the preservation of historic structures, and the development of parks and a community-oriented open space would remain in force under this alternative. Amendment to the General Plan may be required to allow for the change in land use density and intensity.

Page 6-12, Table 6-3 is revised as follows:

Intersections	Existing Plus Cumulative Plus Proposed Project				Existing Plus Cumulative Plus Low Density Alternative			
	AM Peak Hour		PM Peak Hour Hour		AM Peak Hour		PM Peak Hour Hour	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
1. Bon Air Road/Magnolia Avenue	B	9.3	B	11.6	B	9.3	B	8.4
2. Doherty Drive/Magnolia Avenue	B	12.7	C	18.0	B	12.3	B	14.6
3. East Ward Street/Magnolia Avenue	F	**	F	**	F	**	F	**
4. King Street/Magnolia Avenue	E	34.5	F	**	E	33.1	F	**
5. Doherty Drive/Larkspur Plaza	B	6.9	B	9.1	B	5.3	B	8.1
6. Doherty Drive/Piper Park ⁽⁺⁾	D⁺	25.8	D⁺	21.8	C⁺	12.2	C⁺	17.3
7. Doherty Drive/Riviera Circle	E	40.0	E	44.9	E	42.7	D	21.9
8. Lucky Drive/Doherty Drive	C	14.6 <u>15.1</u>	BC <u>BC</u>	9.5 <u>13.5</u>	C	17.4 <u>13.7</u>	C	10.0 <u>12.0</u>
9. Lucky Drive/Fifer Avenue	C	12.2	C	15.5	C	0.5	C	1.0
10. Fifer Ave/Tamal Vista Boulevard	C	24.4	F	74.4	D	26.4	E	55.2
11. Wornum Drive/Tamal Vista Boulevard ^{***}	D	26.3	F	81.2	D	25.4	F	**
12. Wornum Drive/Redwood Highway	B	8.5	B	12.8	B	9.2	C	18.0
13. 101 NB On Ramp/Industrial	B	5.6	C	18.1	B	5.5	C	22.2

Notes:
 Delay is in average seconds per vehicle
 LOS = Level of Service
 ** = Exceeds 120 seconds delay
 *** = The improvement to the intersection of Wornum Drive/Tamal Vista Boulevard has been under construction and may be completed by the end of 2003.
⁺ Assumes Doherty Drive/Piper Park Improvement would be implemented for Low Density Alternative but not under Proposed Project.

Page 6-14, Last Paragraph (continuing to Page 6-15) is revised as follows:

The Residential Focus Alternative would allow development of the Specific Plan area at a higher residential density than would the Proposed Project, with a higher proportion of attached, multifamily homes and greater clustering of housing units (see Table 6-1). Commercial density would be lower. Under the Residential Focus Alternative, Subarea 1 would support up to 44 multifamily apartment units, 12,000 square feet of commercial uses, and a 30-room hotel. Subarea 2 would be redeveloped with 46 multifamily apartment units. Subarea 3 would contain 32 large single-family homes, 11 standard single-family homes, 35 cottage homes, and 27 multifamily units. Similar to the Proposed Project, a community center is not included in this scenario. All Specific Plan related policies and standards are assumed to remain as proposed, and all Specific

Plan policies and requirements related to the maintenance of adequate creek setbacks, the preservation of historic structures, and the development of parks and a community-oriented open space would remain in force under this alternative. Amendment to the General Plan may be required to allow for the change in land use density and intensity.

Page 6-17, First Full Paragraph, First Sentence is revised as follows:

As indicated in Table 6-1, ~~the~~ Residential Focus Alternative would generate an estimated 2,716 daily vehicle trips, with 158 in the a.m. peak hour and ~~224~~²³⁷ in the p.m. peak hour (see Table 6-1).

Page 6-18, Table 6-4 is revised as follows:

Table 6-4 Cumulative Intersection Levels of Service: Proposed Project Versus Residential Focus Alternative								
Intersections	Existing Plus Cumulative Plus Proposed Project				Existing Plus Cumulative Plus Residential Focus			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
1. Bon Air Road/Magnolia Avenue	B	9.3	B	11.6	B	9.6	B	8.5
2. Doherty Drive/Magnolia Avenue	B	12.7	C	18.0	B	12.6	C	16.1
3. East Ward Street/Magnolia Avenue	F	**	F	**	F	**	F	**
4. King Street/Magnolia Avenue	E	34.5	F	**	E	35.3	F	**
5. Doherty Drive/Larkspur Plaza	B	6.9	B	9.1	B	5.6	B	10.2
6. Doherty Drive/Piper Park ⁺	D⁺	25.8	D⁺	21.8	C⁺	12.6	C⁺	18.4
7. Doherty Drive/Riviera Circle	E	40.0	E	44.9	F	46.0	D	24.8
8. Lucky Drive/Doherty Drive	C	14.6 <u>15.1</u>	B <u>C</u>	9.5 <u>13.5</u>	C	18.0 <u>14.5</u>	C	10.4 <u>13.1</u>
9. Lucky Drive/Fifer Avenue	C	12.2	C	15.5	C	0.5	C	1.0
10. Fifer Avenue/Tamal Vista Boulevard	C	24.4	F	74.4	D	26.9	F	60.3
11. Wornum Drive/Tamal Vista Boulevard	D	26.3	F	81.2	D	25.8	F	**
12. Wornum Drive/Redwood Hwy	B	8.5	B	12.8	B	9.2	C	18.0
13. 101 NB On Ramp/Industrial	B	5.6	C	18.1	B	5.5	C	22.6

Notes:
 Delay is in average seconds per vehicle
 LOS = Level of Service
 ** = Exceeds 120 seconds delay
⁺ ~~Assumes implementation of improvement of Doherty Drive/Piper Park intersection for Residential Focus Alternative but not for Proposed Project.~~

Page 6-25, Table 6-5 is revised as follows:

Environmental Issues	Specific Plan	Alternatives		
		No Project Alternative	Lower Density Alternative	Higher Density Residential Focus Alternative
Land Use and Planning	LTS	Similar	Similar	Similar
Housing and Population	LTS	Similar*	Similar*	Similar
Geology and Soils	PS/LTS	Less	Similar	Similar
Hydrology and Water Quality	PS/LTS	Less	Similar	Similar
Biological Resources	PS/LTS	Less	Similar	Similar
Air Quality	PS/LTS	Less	Similar/ Less	Greater
Traffic and Circulation	PS/LTS	Less***	Less	Less**
Noise	PS/LTS	Less	Less	Less
Public Services and Utilities	LTS	Similar	Similar	Similar
Visual Quality and Aesthetics	LTS	Less	Similar	Similar
Historical, Cultural and Archaeological	SU	Less	Similar	Similar
Hazards and Hazardous Materials	PS/LTS	Less	Similar	Similar
Totals				
Greater Impacts		0	0	1
Less Impacts		9	23	2
Similar Impacts		3	109	9
LTS = Less than Significant Impact (no mitigation required) PS/LTS = Less than Significant after Mitigation SU = Significant and Unavoidable Impact (no mitigation available to reduce the impact to a less-than significant level) * Although not an environmental impact, the No Project and Low Density Alternatives would contribute less to assisting the City in meeting its "fair share" of the regional housing need, <u>as required by the Housing Element of the General Plan</u> , and would not add to the supply of housing that might be available for those in the local work force. ** May be SU if City chooses not to install signal at Doherty Drive/Piper Park because of low traffic volumes. *** May be SU if no improvements are implemented at Doherty Drive/Piper Park.				