

KAISER PERMANENTE MEDICAL OFFICE BUILDING

1650 Los Gamos, San Rafael, CA

Assessor's Parcel Numbers: 011-256-12, 011-256-13

Initial Study and Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Lead Agency:

City of San Rafael
Community Development Department
1400 Fifth Avenue (P.O. Box 151560)
San Rafael, CA 94915-1560

Contact: Sean Kennings – LAK Associates

June 9, 2017

This Page Intentionally Left Blank

TABLE OF CONTENTS

NOTICE OF INTENT	5
SUMMARY OF IMPACTS AND MITIGATION MEASURES	7
ENVIRONMENTAL CHECKLIST	20
EXHIBITS.....	27
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	31
EVALUATION OF ENVIRONMENTAL IMPACTS.....	32
EVALUATION OF THE PROJECT ENVIRONMENTAL IMPACTS IS PREPARED AS FOLLOWS:...	32
I. AESTHETICS.....	32
II. AGRICULTURE AND FOREST RESOURCES	37
III. AIR QUALITY.....	38
IV. BIOLOGICAL RESOURCES	41
V. CULTURAL RESOURCES	45
VI. GEOLOGY AND SOILS	49
VII. GREENHOUSE GAS EMISSIONS	53
VIII. HAZARDS AND HAZARDOUS MATERIALS.....	55
IX. HYDROLOGY AND WATER QUALITY	59
X. LAND USE AND PLANNING.....	65
XI. MINERAL RESOURCES	67
XII. NOISE	68
XIII. POPULATION AND HOUSING.....	70
XIV. PUBLIC SERVICES	72
XV. RECREATION.....	74
XVI. TRANSPORTATION/TRAFFIC.....	75
XVII. TRIBAL CULTURAL RESOURCES	81
XVIII. UTILITIES AND SERVICE SYSTEMS.....	84
XIX. MANDATORY FINDINGS OF SIGNIFICANCE	88
SOURCE REFERENCES.....	90
DETERMINATION FOR PROJECT	92

This Page Intentionally Left Blank



DATE: June 9, 2017

TO: Public Agencies, Organizations and Interested Parties

FROM: Sean Kennings, LAK Associates - Contract Planner for City of San Rafael

SUBJECT: NOTICE OF PUBLIC REVIEW AND INTENT TO PREPARE AN ENVIRONMENTAL IMPACT REPORT

Pursuant to the State of California Public Resources Code and the “Guidelines for Implementation of the California Environmental Quality Act of 1970” as amended to date, this is to advise you that the Department of Community Development of the City of San Rafael has prepared an Initial Study on the following project:

Project Name:

Kaiser Permanente 1650 Los Gamos Drive Medical Office Building

Location:

1650 Los Gamos Drive, San Rafael, Marin County, California, APNs: 165-220-12 and 165-220-13.

Property Description:

The subject property is approximately 11.1 acres in size located in north San Rafael. The subject property consists of two separate parcels bisected by Los Gamos Drive. APN 165-220-13 is a 178,160-square foot parcel previously developed with an existing approximately 148,000 square foot office building and associated surface parking. Across Los Gamos to the west is APN 165-220-12, a 305,791-square foot parcel developed with an approximately 80,000 square foot terraced surface parking lot and landscaping. The remainder of this parcel is characterized by oak woodland.

Project Description:

Kaiser Permanente is proposing a project with three components (collectively defined as “the proposed project”):

- Amendment to the current Planned Development (PD) zoning to add medical office use as an allowable use in the PD and allow the existing 148,000-gross square foot office building, located at 1650 Los Gamos Drive in San Rafael, it to be utilized as a medical office building (“MOB”).
- The construction of an up-to 511-space parking structure on the existing surface parking lot located to the west of 1650 Los Gamos Drive that will primarily serve the Kaiser Permanente employees working at the MOB (“parking structure”).

- Continued use of the 42 existing parking spaces located adjacent to 1650 Los Gamos Drive, on the 1600 Los Gamos Drive property. Kaiser Permanente has legal access to the use of those parking spaces through an easement and is not proposing any changes to the parking spaces.

Both 1650 and 1600 Los Gamos Drive were originally developed pursuant to a single PD District, which permits 1650 Los Gamos Drive to be constructed with up to 150,000 square feet of office uses and 1600 Los Gamos Drive to be constructed with up to 340,000 square feet of office uses.

To provide adequate parking for the use of the MOB at 1650 Los Gamos Drive, Kaiser Permanente is proposing to construct a new up-to 511-space parking structure on the site of the existing surface parking lot to the west of the existing building.

Discretionary approvals or permits needed to construct and operate the Project will include: 1) an amendment to the existing PD District for the site to (i) allow medical office uses at 1650 Los Gamos Drive in addition to existing office uses, and to (ii) separate the PD District from 1600 Los Gamos Drive, except for the surface parking area covered by an easement; 2) a Master Use Permit Amendment; 3) a Major Design Review Permit; and 4) a Sign Program.

Additional approvals may be required from the County of Marin and the California Department of Transportation (Caltrans), as responsible agencies, to allow for any project mitigations identified within their jurisdictional boundaries. Approvals from the Las Gallinas Valley Sanitary District will also be required to relocate the sanitary sewer line. Other responsible agencies and additional approvals may be identified through the environmental review process.

Environmental Issues:

The proposed project would result in significant adverse impacts upon traffic and circulation due to the proposed requirement of a major intersection improvement. In addition, because a comprehensive analysis of potential environmental impacts has not yet been undertaken, the proposed project could potentially result in impacts to Air Quality, Greenhouse Gas Emissions, Land Use and Planning, Noise, and Traffic and Transportation. These thresholds will be further discussed in an Environmental Impact Report (EIR) and mitigations will be identified, analyzed and implemented to the extent feasible to reduce potential environmental impacts to less than significant levels.

The Initial Study document has been prepared in consultation with local, and state responsible and trustee agencies and in accordance with Section 15063 of the California Environmental Quality Act (CEQA).

A thirty-day (30-day) public review period shall commence on **June 9, 2017**. Written comments must be sent to the City of San Rafael, Community Development Department, Planning Division, 1400 Fifth Avenue, San Rafael CA 94901 **by July 10, 2017**. The City of San Rafael Planning Commission will hold a public hearing soliciting comments on the scope of issues to be addressed and alternatives that should be considered in the EIR on **June 27, 2017, 7:00 PM in the San Rafael City Council Chambers at City Hall (address listed above)**. **Correspondence and comments can be delivered to Sean Kennings, project planner, phone: (415) 533-2111, email: sean@lakassociates.com.**

SUMMARY OF IMPACTS AND MITIGATION MEASURES

Summary of Impacts and Mitigation Measures : Kaiser Permanente: 1650 Los Gamos Medical Office Building			
Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Potentially Significant: Less Than Significant Without Mitigation: Less than Significant:	(PS) (LTSWM) (LTS)		(PS) (LTSWM) (LTS)
I. Aesthetics			
I (d). Would the project: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	PS	MM AES-1: Prior to the issuance of any building permits, the Project applicant shall submit to the satisfaction of the Community Development Department Director, Project building plans that include a photometric lighting study demonstrating that outdoor lighting fixtures meet the requirements of the California Energy Code (known as Part 6, Title 24 of the California Code of Regulations).	LTS
III. Air Quality			
III (a): Would the project: Conflict with or obstruct implementation of the applicable air quality plan?	PS	As the full analysis of traffic related impacts is still unknown, air quality as it relates to project generated traffic is also unknown. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will analysis of potential traffic mitigation measures and as a result potential temporary and cumulative mitigation measures necessary to reduce potential air quality impacts to less than significant levels. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	PS
III (b): Would the project: Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	PS	This Initial Study provides a preliminary analysis to identify the impacts of the project upon Air Quality considerations. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will	PS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		include analysis of potential traffic mitigation measures as well as potential temporary and cumulative mitigation measures necessary to reduce potential air quality impacts to less than significant levels. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	
III (c): Would the project: Result in a cumulatively considerable net increase 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)?	PS	This Initial Study provides a preliminary analysis to identify the impacts of the project upon Air Quality considerations. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will provide analysis of potential traffic impacts and mitigation measures as well as potential cumulative impacts and subsequent mitigation measures necessary to reduce potential impacts to less than significant levels will also be evaluated. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	PS
III (d): Would the project: Expose sensitive receptors to substantial pollutant concentrations?	PS	Because construction methods have not been fully evaluated, preparation of an Environmental Impact Report is required. The EIR will provide analysis of potential traffic and construction impacts and mitigation measures as well as potential cumulative impacts and subsequent mitigation measures necessary to reduce potential impacts to less than significant levels will also be evaluated. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	PS
IV. Biological Resources			
IV (d): Would the project:	PS	MM BIO-1: Prior to issuance of a grading or building	LTS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
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?		<p>permit, the project sponsor shall conduct a preconstruction nesting bird and bat survey. Preconstruction surveys shall include the following:</p> <ol style="list-style-type: none"> 1) Perform any vegetation trimming and/or removal outside of the bird nesting season (Sept. 1 – Feb. 14); 2) Provide a worker environmental awareness training for construction personnel; 3) Perform preconstruction surveys for nesting migratory birds by a qualified biologist no more than 72 hours prior to the start of construction for activities occurring during the breeding season (February 15 to August 31); and 4) If work is to occur within 300 feet of active raptor nests or 50 feet of active passerine nests, non-disturbance buffers will be established at a distance sufficient to minimize disturbance. 	
V. Cultural Resources			
V (b): Would the project: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	PS	MM CULT-1: Protect Archaeological Resources Identified during Construction: The project sponsor shall ensure that construction crews stop all work within 100 feet of the discovery until a qualified archaeologist can assess the previously unrecorded discovery and provide recommendations. Resources could include subsurface historic features such as artifact-filled privies, wells, and refuse pits, and artifact deposits, along with concentrations of adobe, stone, or concrete walls or foundations, and concentrations of ceramic, glass, or metal materials. Native	LTS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		American archaeological materials could include obsidian and chert flaked stone tools (such as projectile and dart points), midden (culturally derived darkened soil containing heat-affected rock, artifacts, animal bones, and/or shellfish remains), and/or groundstone implements (such as mortars and pestles).	
<p>V (d): Would the project: Disturb any human remains, including those interred outside of dedicated cemeteries?</p>	PS	<p>MM CULT-2: Protect Human Remains Identified During Construction: The Project proponent shall treat any human remains and associated or unassociated funerary objects discovered during soil-disturbing activities according to applicable State laws. Such treatment includes work stoppage and immediate notification of the Marin County Coroner and qualified archaeologist, and in the event that the Coroner’s determination that the human remains are Native American, notification of NAHC according to the requirements in PRC Section 5097.98. NAHC would appoint a Most Likely Descendant (MLD). A qualified archaeologist, Project proponent, County of Marin, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 48 hours to reach agreement on these matters.</p>	LTS
VII. Greenhouse Gases			

Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
<p>VII (a): Would the project: Generate greenhouse gas (“GHG”) emissions, either directly or indirectly, that may have a significant impact on the environment?</p>	<p align="center">PS</p>	<p>The project applicant has submitted a Traffic Impact Analysis of the proposed project that will be evaluated pursuant to CEQA and the City of San Rafael standards and regulations. As such, impacts related to increased traffic trips would be addressed in the project EIR. This Initial Study provides a preliminary analysis to identify the impacts of the project upon Greenhouse Gas Emissions considerations. The EIR will provide analysis of potential traffic, construction, and operational impacts and develop potential temporary and cumulative mitigation measures necessary to reduce potential GHG impacts to less than significant levels through compliance with the implementing Ordinances and the San Rafael CCAP. The EIR would also address project alternatives to analyze this potentially significant adverse impact.</p>	<p align="center">PS</p>
<p>VII (b): Would the project: Conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of greenhouse gases?</p>	<p align="center">PS</p>	<p>The project applicant has submitted a Traffic Impact Analysis of the proposed project that will be evaluated pursuant to CEQA and the City of San Rafael standards and regulations. As such, impacts related to increased traffic trips would be addressed in the project EIR. This Initial Study provides a preliminary analysis to identify the impacts of the project upon Greenhouse Gas Emissions considerations. The EIR will provide analysis of potential traffic, construction, and operational impacts and develop potential temporary and cumulative mitigation measures necessary to reduce potential GHG impacts to less than significant levels through compliance with the implementing Ordinances and the San Rafael CCAP. The EIR would also address project alternatives to analyze this potentially</p>	<p align="center">PS</p>

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		significant adverse impact.	
IX. HYDROLOGY AND WATER QUALITY			
<p>IX (a): Would the project: Violate any water quality standards or waste discharge requirements?</p>	PS	<p>MM HYDRO-1: Prior to grading activities, the project applicant shall prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be prepared by a Qualified SWPPP Developer (QSD). The SWPPP shall include the minimum Best Management Practices (BMPs) required for the identified risk level. The SWPPP shall be designed to address the following objectives:</p> <p>(1) All pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled;</p> <p>(2) Where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated;</p> <p>(3) Site BMPs are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and</p> <p>(4) Stabilization BMPs installed to reduce or eliminate pollutants after construction are completed.</p> <p>(5) BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best</p>	LTS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual.	
<p>IX (a): Would the project: Violate any water quality standards or waste discharge requirements?</p>	PS	<p>MM HYDRO-2: Prior to a certificate of occupancy, the project applicant shall verify that operational stormwater quality control measures that comply with the requirements of the current Phase II Small MS4 Permit have been implemented. Responsibilities include but are not limited to:</p> <ol style="list-style-type: none"> 1) Designing BMPs into project features and operations to reduce potential impacts to surface water quality and to manage changes in the timing and quantity of runoff associated with operation of the project. These features shall be included in the design-level drainage plan and final development drawings. 2) The proposed project shall incorporate site design measures and Low Impact Development design standards, including minimizing disturbed areas and impervious surfaces, infiltration, harvesting, evapotranspiration, and/or bio-treatment of stormwater runoff. 3) The project applicant shall establish an Operation and Maintenance Plan. This plan shall specify a regular inspection schedule of stormwater treatment facilities in accordance with the requirements of the Phase II Small MS4 Permit. 4) Funding for long-term maintenance of all BMPs shall be specified. 	LTS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
IX (b): Would the project: 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?	PS	Implementation of MM HYDRO-1	LTS
IX (f): Would the project: Otherwise substantially degrade water quality?	PS	Implementation of MM HYDRO-1	LTS
X. Land Use and Planning			
X (b): Would the project: 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?	PS	The proposed project has not been evaluated for consistency with the policies in the General Plan Climate Change Action Plan (CCAP), which seek to limit GHG emissions and implement regional air quality goals. This Initial Study provides a preliminary analysis to identify the impacts of the project upon Greenhouse Gas Emissions considerations. As such, impacts related to increased traffic trips would be addressed in the project EIR. The EIR will provide analysis of potential traffic, construction, and operational impacts and develop potential temporary and cumulative mitigation measures necessary to reduce potential GHG impacts to less than significant levels through compliance with the implementing Ordinances and the San Rafael CCAP. Therefore, the proposed project would need to be further evaluated to ensure there is no conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	PS
XII. Noise			
XII (a): Would the project: Exposure of persons to or generation of noise levels	PS	The project applicant has submitted a Traffic Impact Analysis of the proposed project that will be evaluated	PS

Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		pursuant to CEQA and the City of San Rafael standards and regulations. As such, impacts related to increased traffic trips would be addressed in the project EIR. This Initial Study provides a preliminary analysis to identify the impacts of the project upon Noise considerations. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will provide analysis of potential traffic, construction, and operational impacts and as a result potential temporary and cumulative mitigation measures necessary to reduce potential Noise impacts to less than significant levels. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	
XII (b): Would the project: Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	PS	Evaluation of the construction activities has not been determined to involve excessive ground borne vibration or ground borne noise levels. This Initial Study provides a preliminary analysis to identify the impacts of the project upon Noise considerations including impacts related to construction activities. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will provide analysis of potential construction impacts and as a result evaluate potential mitigation measures necessary to reduce potential construction Noise impacts to less than significant levels. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	PS
XII (c): Would the project: A substantial permanent increase in ambient noise	PS	Evaluation of the long term operational activities of the proposed project has not yet been determined and therefore	PS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
levels in the project vicinity above levels existing without the project?		it is unknown if the project would result in substantial permanent increase in ambient noise levels in the project vicinity. However, this Initial Study provides a preliminary analysis to identify the impacts of the project upon Noise considerations including impacts related to ambient noise levels. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will provide analysis of potential construction impacts and as a result evaluate potential mitigation measures necessary to reduce potential construction Noise impacts to less than significant levels. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	
XII (d): Would the project: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	PS	See Response XII (a) and (b) above. Discussion of temporary construction noise impacts and ongoing traffic impacts and potential recommended mitigation measures related to the proposed project would be addressed in a project EIR.	PS
XVI. Traffic and Transportation			
XVI (a): Would the project: Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant component of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass	PS	Although the TIA provides potential mitigation measures to reduce the project's impacts, several traffic impacts have been identified that would remain significant and unavoidable. This Initial Study provides a preliminary analysis to identify the impacts of the project upon Traffic and Transportation considerations. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will provide analysis of potential traffic impacts and potential cumulative impacts and mitigation	PS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
transit)?		measures necessary to reduce potential impacts to less than significant levels. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	
XVI (b): Would the project: Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	PS	As the TIA will be further evaluated by the City of San Rafael, potential conflicts with applicable congestion management programs, including, but not limited to level of service standards and travel demand measures have not yet been identified and could remain significant and unavoidable. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will provide analysis of potential traffic impacts and potential cumulative impacts and mitigation measures necessary to reduce potential impacts to less than significant levels. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	PS
XVI (d): Would the project: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	PS	The project traffic study was evaluated by the City of San Rafael Department of Public Works for traffic and circulation compliance with City standards including potential conflicts to site distances and found them to be acceptable. However, the full analysis of proposed project improvements, including the proposed signalized intersection at Los Gamos Drive and Lucas Valley Road have not yet been evaluated. This Initial Study provides a preliminary analysis to identify the impacts of the project upon Traffic and Transportation considerations. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will provide analysis of	PS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		potential traffic impacts and mitigation measures necessary to reduce potential impacts to less than significant levels will also be evaluated. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	
<p>XVI (f): Would the project: Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</p>	PS	This Initial Study provides a preliminary analysis to identify the impacts of the project upon Traffic and Transportation considerations. Based upon this initial review, preparation of an Environmental Impact Report is required. The EIR will provide analysis of potential traffic impacts and mitigation measures necessary to reduce potential impacts to less than significant levels will also be evaluated. The EIR would also address project alternatives to analyze this potentially significant adverse impact.	PS
XVII. Tribal Cultural Resources			
<p>XVIII. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is Geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>(a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p>	PS	<p>MM TRIBAL-1: Implementation of the unanticipated discovery measures outlined in Section V(b) and (d) above, address the potential discovery of previously unknown resources within the project area. If significant tribal cultural resources are identified onsite, all work would stop immediately within 50 feet of the resource(s) and the project applicant would comply with all relevant State and City policies and procedures prescribed under PRC Section 21074.</p>	LTS

**Summary of Impacts and Mitigation Measures
: Kaiser Permanente: 1650 Los Gamos Medical Office Building**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
<p>(b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>			

THIS PAGE INTENTIONALLY LEFT BLANK

ENVIRONMENTAL CHECKLIST

- 1. Project Title** Kaiser Permanente 1650 Los Gamos Drive Medical Office Building
- 2. Lead Agency Name & Address** City of San Rafael
Community Development Department
Planning Division
1400 Fifth Avenue
San Rafael, California 94901
- 3. Contact Person & Phone Number** Sean Kennings, LAK Associates
Phone: (415) 533-2111
Email: sean@lakassociates.com
- 4. Project Location** The site is located in the City of San Rafael, Marin County, California at 1650 Los Gamos Drive, Assessor's Parcel Nos. 165-220-12 & 165-220-13. (Refer to Exhibit A, "Vicinity Map").
- 5. Project Sponsor's Name & Address** Project Sponsor:
Kaiser Foundation Health Plan
Real Estate Department
1950 Franklin Street – 12th Floor
Oakland, CA 94612
- 6. General Plan Designation** Office – 15-32 units/acres
- 7. Zoning** Planned Development District (PD 1590)
- 8. Description of Project**

Environmental Setting and Background

The applicant, Kaiser Foundation Hospitals (Kaiser Permanente), proposes a medical office building project at 1650 Los Gamos Drive in the City of San Rafael, California. The project site is located in the North San Rafael Commercial Center district just west of Highway 101 at the intersection of Lucas Valley Road and Los Gamos Drive. An existing building at 1650 Los Gamos Drive is surrounded by several existing surface parking lots. There is also an office building owned by Marin County to the south of the project site, at 1600 Los Gamos Drive. The project site is located in a mixed-use office/commercial area and is separated approximately 250' from the nearest residential structure by an open space hillside.

The project site includes three corresponding parcels, two of which (1650 Los Gamos Drive and an adjacent surface parking lot) are owned by Kaiser Permanente and the third (1600 Los Gamos Drive) is owned by Marin County. Together, these parcels comprise the "project site" and are more fully described as follows:

- An existing building at 1650 Los Gamos Drive (Assessor Parcel Number's [APN] 165-220-13), includes a three-story, approximately 148,000 square foot office building and associated surface parking on approximately 4.02 acres.
- An approximately 7.02-acre parcel located to the west of 1650 Los Gamos Drive, on the west side of Los Gamos Drive (APN 165-220-12). The parcel currently consists of a surface parking lot and

vegetative hillside, and abuts an undeveloped hillside slope, with a single-family subdivision above. There is also an existing sanitary sewer line running through the parcel.

- The surface parking site at 1600 Los Gamos Drive (APN: 165-220-11), a portion of which Kaiser holds a parking easement (to allow the use of 42 parking spaces for 1650 Los Gamos Drive).

Project Description

Kaiser Permanente is proposing a project with three components:

- Amendment to the current Planned Development (PD) zoning to add medical office use as an allowable use in the PD and allow the existing 148,000-gross square foot office building, located at 1650 Los Gamos Drive in San Rafael, it to be utilized as a medical office building (MOB).
- The construction of an up-to 511-space parking structure on the existing surface parking lot located to the west of 1650 Los Gamos Drive that will primarily serve the Kaiser Permanente employees working at the MOB (parking structure).
- Continued use of the 42 existing parking spaces located adjacent to 1650 Los Gamos Drive, on the 1600 Los Gamos Drive property. Kaiser Permanente has legal access to the use of those parking spaces through an easement and is not proposing any changes to the parking spaces.

Both 1650 and 1600 Los Gamos Drive were originally developed pursuant to a single PD District, which permits 1650 Los Gamos Drive to be constructed with up to 150,000 square feet of office uses and 1600 Los Gamos Drive to be constructed with up to 340,000 square feet of office uses.

To provide adequate parking for the use of the MOB at 1650 Los Gamos Drive, Kaiser Permanente is proposing to construct a new up-to 511-space parking structure on the site of the existing surface parking lot to the west of the existing building.

Discretionary approvals or permits needed to construct and operate the Project will include: 1) an amendment to the existing PD District for the site to (i) allow medical office uses at 1650 Los Gamos Drive in addition to existing office uses, and to (ii) separate the PD District from 1600 Los Gamos Drive, except for the surface parking area covered by an easement; 2) a Master Use Permit Amendment; 3) a Major Design Review Permit; and 4) a Sign Program.

Additional approvals may be required from the County of Marin and the California Department of Transportation (Caltrans), as responsible agencies, to allow for any project mitigations identified within their jurisdictional boundaries. Approvals from the Las Gallinas Valley Sanitary District will also be required to relocate the sanitary sewer line. Other responsible agencies and additional approvals may be identified through the environmental review process.

At full buildout, the MOB would contain approximately 70 provider offices anticipated to provide the following services:

- | | |
|---------------------|--------------------|
| • Member Services | • Dermatology |
| • Health Education | • Eye Services |
| • Internal Medicine | • Physical Therapy |
| • Pediatrics | • Imaging |
| • OB/GYN | • Pharmacy |
| • Endocrinology | • Laboratory |
| • Rheumatology | |

Other services, such as an urgent care clinic, may also be included in the MOB, and the mix of services will change over time to reflect the changes needs of the local membership base. There would be approximately 315 employees working at 1650 Los Gamos Drive at full buildout. Many of these employees, about 77%, or 245, would be relocated from existing Kaiser Permanente facilities throughout Marin County. Approximately 70%, or 170, of these relocated Marin employees would be relocated from the Kaiser Permanente Medical Center at 99 Montecillo Road, San Rafael.

The proposed project will not increase the footprint, height or massing of the existing office building. The medical office uses will be contained within the existing building and no substantial exterior changes are proposed to the MOB. The only proposed exterior changes to the existing building at 1650 Los Gamos Drive are minor improvements to the landscaping and new signage to identify the facility and to provide a brand identity.

For purposes of this environmental review, the proposed reuse of the existing building is assumed to have up to 150,000 square feet of medical office space, which is the maximum amount allowed for development under the existing PD zoning.

Draft Traffic Impact Analysis

The project applicant contracted the services of Fehr & Peers to prepare a Draft Transportation Impact Analysis (DTIA) for the proposed project. The DTIA analyzes the transportation impacts associated with the applicant's proposal to add medical office as an allowed use at the existing 1650 Los Gamos Drive office building. Although not considered an environmental impact, the DTIA also included a parking analysis consistent with the City of San Rafael parking requirements. Fehr & Peers determined that the proposed project is an infill development because it does not require new construction on undeveloped land, as the existing office building will not be expanded and the proposed parking structure will be located on the existing parking lot. At the time Fehr & Peers collected data for the DTIA, the existing office building was approximately 34% occupied. However, historically, the office building has been close to 100% occupied over the majority of its existence from 1979 to the late 2000's.

Potential Intersection Improvement

The DTIA identifies a potential intersection improvement for the Lucas Valley Road/Los Gamos Drive interchange. This potential improvement includes signalization of the intersection, providing multiple through and turns lanes, and crosswalks and sidewalks for pedestrians. This intersection improvement is consistent with planned improvements for this intersection identified in the San Rafael General Plan 2020 Policy C-7. The potential intersection improvement is included as Figure 3 below.

Access, Circulation and Parking

There are a total of 455 existing parking spaces allocated to the project site consisting of:

- 204 spaces surrounding the building at 1650 Los Gamos Drive
- 209 spaces on the existing surface parking lot on the west side of Los Gamos Drive
- 42 spaces located on the adjacent 1600 Los Gamos Drive property, which are legally allocated to 1650 Los Gamos Drive through an easement

The overall project site currently provides approximately 3.1 parking spaces to 1,000 square feet of office space (a parking ratio of 3.1:1,000), consistent with the City's municipal code provisions in place at the time the building was originally constructed and in line with the PD District parameters currently in place. To meet current City parking requirements for medical office uses, Kaiser Permanente is required to provide additional parking, as discussed below.

The existing building is served by 455 existing parking spaces. The current City municipal code requires a parking ratio of 4.4 parking spaces per 1,000 square feet of office space for medical uses, which would result in a shortfall of approximately 203 parking spaces once the entire building is utilized as medical office. As a result, Kaiser Permanente needs to provide at least 203 additional parking spaces to meet the City's minimum requirements. In addition, based on its experience, Kaiser Permanente's preferred parking ratio is 5:1,000 (or about 285 additional parking spaces), since many of its members are unable to take public transit due to the health issues for which they are visiting the facility.

To provide adequate parking for the use of the MOB at 1650 Los Gamos Drive, Kaiser Permanente is proposing to construct a new approximately 511-space parking structure on the surface parking lot to the west of the existing building. At 511 parking spaces, the new parking structure would provide a net increase of 302 parking spaces above the current 209 surface spaces. After completion of the parking structure, including the 246 parking spaces that would remain around the MOB, the proposed project would result in a total of 757 parking spaces, meeting the Kaiser Permanente standard. Sheet A-110 of the Design Review Package depicts the potential location of a future parking facility. Kaiser Permanente is still studying the ideal size of the parking structure, but it would not exceed 511 parking spaces and would not provide less than the City required parking minimum of 203 parking spaces.

Parking Structure Design

The proposed parking structure will be partially buried into the hillside and screened by a stand of existing mature trees. The trees will provide a back drop to the parking structure, which also buffers it from surrounding properties. The design of the proposed parking structure is based on a very efficient, straight-forward approach with concrete as the main structural component. There will be railings at each level along the east and north sides of the facility that provide a very open and light architecture. The proposed parking structure will have an enclosed elevator and stair element at the southeast corner adjacent to the existing cross walk. The elevator/stair element will be clad in a material that will provide texture that softens and blends well with the concrete structure. Use of the same cladding at the upper portion of the northeast corner will help define the vehicular entry/exit and wraps the stairs at this end to relate to the elevator/stair element at the opposite end. The proposed parking structure will be fully sprinklered and outfitted with fire extinguishers/cabinets per current codes and ordinances. Fire access will also be provided by fire lanes on both the north and south side of the parking structure, and from Los Gamos Drive. The parking structure will have LED lighting throughout and will be fully accessible per ADA requirements.

Vehicular access will be provided from Los Gamos Drive. The three existing driveways on the east side of Los Gamos Drive will continue to provide primary access to the existing building. The proposed parking structure would be accessed by a single driveway on the west side of Los Gamos Drive, with fire lanes located on both the north and south side of the structure. Kaiser Permanente has requested that the City allow it to stripe "Keep Clear" lane markings in front of the parking structure driveway to permit vehicles turning in and out of the driveway when traffic along Los Gamos Drive is in queue.

Pedestrians will access the project site from the sidewalks on both sides of Los Gamos Drive, connecting to sidewalks along Lucas Valley Road, as well as connecting to the bus pad/stop at the Highway 101 ramp interchange.

Bicyclists will access the project site from the existing Class II bike lane on Lucas Valley Road. The Project will also provide approximately 64 on-site bicycle parking spaces (34 at the MOB, 30 at the parking structure) to encourage bicycle usage.

Transportation Demand Management Program

The San Rafael Medical Center operates an existing transportation demand management program (San Rafael Kaiser Permanente TDM) to increase the use of alternative modes of transportation by employees. Currently, the San Rafael Kaiser Permanente TDM includes the Kaiser Permanente facilities at: 99 Montecillo Road, 820 Las Gallinas, 111 Smith Ranch Road, 100 Smith Ranch Road, 7200 Redwood Blvd., 1033 3rd Street, 3900 Lakeville Hwy, and 97 San Marin Drive. The 1650 Los Gamos Drive MOB would be integrated in the existing program.

The San Rafael Kaiser Permanente TDM will include the following services for Kaiser Permanente employees working at the facilities listed above:

- Transportation manager to oversee the San Rafael Kaiser Permanente TDM
- Commuter subsidy for transit or vanpool use
- Pre-tax community spending accounts
- Guaranteed Ride Home program
- Carpool Matching (provided through 511.org)
- Vanpool Matching
- Internal website that provides information on San Rafael Kaiser Permanente TDM and alternative modes of transportation

The proposed project's MOB will also provide on-site bicycle parking, as well as dedicated parking for carpool/vanpools and electric charging stations for electric vehicles to comply with San Rafael regulatory requirements.

Drainage and Grading

The development of the proposed parking structure will require excavation to partially bury the rear of the structure and with the goal of minimizing the impact to the existing trees. With the current design, approximately 15,000 cubic feet of excavation is required for construction of the proposed parking structure. This 15,000 cubic feet of material would be removed and disposed of off-site. The proposed parking structure will have a concrete retaining wall system integrated with the overall structural system. Retaining walls will be primarily on the south, west and north sides. The water retention/planter area on the east side will utilize concrete retainage.

A 6-inch public sanitary sewer main, operated and maintained by the Las Gallinas Valley Sanitary District ("LGVSD"), runs along a 10-foot easement through the site of the proposed parking structure. This pipe will be re-routed around west and north side of the proposed parking structure footprint.

Proposed Landscaping and Associated Improvements

The parking structure is proposed to be located within the footprint of an existing parking lot to reduce the limits of disturbance. The majority of trees proposed for removal are mature landscaping trees located within this footprint, though many of the larger trees around the perimeter of the existing parking lot would be retained by keeping project construction and grading out of the critical root zones of these trees. Approximately 61 trees are proposed to be removed and 31 new trees would be planted around the perimeter of the parking structure as replacement. The existing and proposed perimeter trees will provide screening of the new parking structure and provide habitat for local species. The design also integrates terraced planter walls that collect and treat stormwater in native planting beds. The terraces transition the grade change from street level to the parking structure.

Planning Applications

In addition to this Initial Study (IS17-001), the 1650 Los Gamos Drive project would require a number of discretionary permits, including the following:

Environmental and Design Review (ED17-001) - The project requires an Environmental and Design Review Permit because it is proposing a new three-story parking structure. The project is subject to the

review criteria for Environmental and Design Review Permits pursuant to San Rafael Municipal Code Section 14.25.050, which provide guidelines for all aspects of project design, including site design, architecture, materials and colors, walls, fences and screening, exterior lighting, signs and landscape design.

Use Permit (UP17-005) - The project includes a request for approval of a use permit to allow medical office, pursuant to Section 14.07.020 of the San Rafael Municipal Code.

Zoning Change (ZC17-001) The project includes a request for PD amendment or zoning change to allow medical office uses in the existing PD ordinance, pursuant to Section 14.07.150 of the San Rafael Municipal Code. This action will create a new PD ordinance specific to 1650 Los Gamos Drive property

Signage Program (SP17-002) - The Project includes a request for approval of a signage master plan for the site.

Existing PD and Amendment Consistency

In conjunction with this project, the City of San Rafael will initiate a concurrent amendment to the existing PD 1590 district, removing references to the building, parking or description of the 1650 Los Gamos site. No other changes to the land use allowance for the County's property at 1600 Los Gamos are proposed. This action to amend PD 1590 for 1600 Los Gamos Dr will ensure that prior references to 1650 Los Gamos in the newly created district are separate and apart from the uses and standards attributed to the PD specific to the 1600 Los Gamos Drive property. This action will remove reference to 1650 Los Gamos Drive in PD 1590, and like the zoning change for the proposed project, would therefore create a new PD for the 1600 Los Gamos Drive parcel.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The project site is located in North San Rafael, immediately west of US Highway 101 and south of the intersection of Lucas Valley Road and Los Gamos Drive.

10. Other Public Agencies Whose Approval Is Required [e.g., Permits, Financing Approval, or Participation Agreement.]

The following additional public agencies will review and comment upon the project plans and Initial Study:

- Regional Water Quality Control Board (RWQCB)
- Marin Municipal Water District
- Las Gallinas Valley Sanitary District CalTrans
- Marin County Community Development Agency – Department of Public Works

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Garcia and Associates ("GANDA") sent a letter to the Graton Rancheria of Federated Indians on April 28, 2017 to formally begin the consultation process. The Tribe responded via email on May 17, 2017 requesting updated consultation.

EXHIBITS

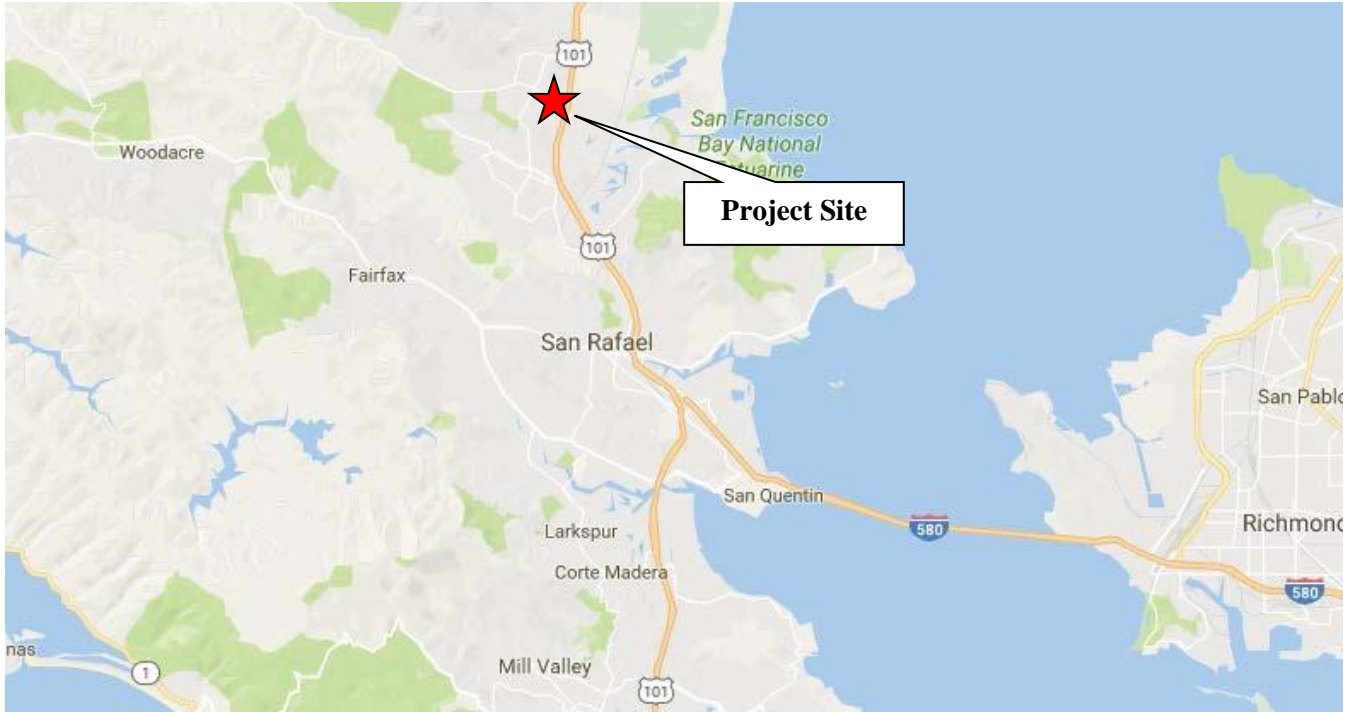


Figure 1: Vicinity Map



Figure 2: Project Site



Figure 3: Site Plan



EXTERIOR RENDERING- VIEW OF PARKING STRUCTURE FROM LOS GAMOS DRIVE HEADING SOUTH

Figure 4: Parking Structure Perspective



Note: Conceptual illustration not to scale.
 Source: BKF, Kaiser Permanente (2017)

Figure 5: Potential Intersection Improvement

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below 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 checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology /Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality |
| <input checked="" type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input checked="" type="checkbox"/> Mandatory Finding of Significance | | |

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an EARLIER EIR or NEGATIVE DECLARATION pursuant to applicable legal standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Sean Kennings,
Contract Planner - LAK Associates

EVALUATION OF ENVIRONMENTAL IMPACTS

Evaluation of the Project environmental impacts is prepared as follows:

A brief explanation is provided for all answers except for “No Impact” answers that are adequately supported by the information sources cited in the parentheses following each question below. Answers take into account the whole action involved, including off-site, on-site, cumulative, project-level, direct and indirect, construction and operational impacts. A “No Impact” answer is adequately supported by referenced information sources that show the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone; the project involves a minor zoning text amendments that would not lead to or allow new construction, grading or other physical alterations to the environment). A “No Impact” answer is explained where it is based on project-specific factor as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project specific screening analysis).

A “Potentially Significant Impact” is appropriate where there is substantial evidence that an effect may be significant. A final determination of one or more Potentially Significant Impacts shall require preparation of an EIR.

A Negative Declaration or Mitigated Negative Declaration shall be prepared for the project if it results in a less than significant impact determination based on the analysis, discussion, source reference materials and/or mitigation measures identified herein (to minimize impacts or reduce impacts from a “Potentially Significant” level). Any mitigation measures shall be described and briefly explain how they reduce the effect to a less than significant level.

Mitigation measures or discussion from earlier analysis may be used where, pursuant to tiering, program EIR or other CEQA process, an effect has been adequately analyzed in an earlier environmental document. Section 15063(c)(3)(D). In this case, the Initial Study below includes a brief discussion of the earlier analysis used, impacts that were previously addressed, and mitigation measures that were incorporated or refined. Supporting information sources are attached and cited in the discussion below.

Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
--------------------------------	---	------------------------------	-----------

I. AESTHETICS

Would the project:

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

Discussion:

No Impact: No scenic vistas have been identified in the General Plan at or in the immediate vicinity of this site. The 1650 Los Gamos Drive MOB would be considered an urban infill development project located in the North San Rafael Commercial Center area. The project would involve converting an existing office building to medical office uses and replacing an existing terraced surface parking lot with a three-story parking structure to satisfy parking requirements for the new use. The project would be generally consistent with existing zoning standards and General Plan land use designations. There would be no impact.

(Sources: 1, 3)

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

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

Discussion:

No Impact: The project site is located approximately 500 feet west of US 101 Highway at the Lucas Valley Road/Los Gamos Drive intersection in the North San Rafael Commercial Center District. The segment of US 101 is not a designated state scenic highway. Proposed project improvements would occur within footprints of existing disturbance. Although the construction of the parking structure would require removal of existing landscaping trees, this would not be considered an impact to scenic resources. Several mature redwood trees beyond the surface parking lot would be retained as part of the proposed project. As such, because the project is not located within a state scenic highway and would not be substantially damaging scenic resources, there would be no impact.

(Sources: 1, 3)

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

Discussion:

Less Than Significant Impact: The proposed project would require the construction of a three-story parking structure on the western parcel (165-220-12) to accommodate the parking spaces required to convert the existing building to medical office uses. Construction of the structure would require the removal of 61 existing ornamental trees. Although these trees are primarily mature parking lot landscaping trees, these 61 trees are not considered to have “significant” status per the San Rafael Municipal Code. A total of 31 trees are proposed as replacement as part of the project.

To accommodate the three-story parking structure, excavation will be required to reduce the mass and scale of the parking structure by lowering the profile and burying a portion of the garage into the hillside. Although the parking structure would not project over ridgelines or block views to cause potentially significant impacts on visual resources, the proposed project would represent a new sizable development footprint in an area currently screened by mature landscaping vegetation proposed to be removed. However, the proposed parking structure has been designed to retain mature redwood trees that ring the perimeter of the existing surface parking lot. These mature redwoods create an effective visual screen of the project to the homes in the Mont San Rafael neighborhood above (and west/southwest of) the site. Furthermore, because the proposed parking garage is located in an area formerly developed with surface parking and does not extend outside the existing areas of disturbance; the retention of mature screening vegetation will greatly reduce the potential for visual degradation. The project application includes a photo-simulation from two vantage points within the vicinity of the project: 1.) View from Los Gamos Drive; 2.) View from Salvatore Way. These before and after images are included below:

*Potentially
Significant
Impact*

*Less-Than-
Significant With
Mitigation
Incorporation*

*Less-Than-
Significant
Impact*

*No
Impact*



PHOTOSIMULATION 1: View from Los Gatos looking southwest from Lucas Valley Road intersection prior to (above) and including (below) proposed parking structure

*Potentially
Significant
Impact*

*Less-Than-
Significant With
Mitigation
Incorporation*

*Less-Than-
Significant
Impact*

*No
Impact*



PHOTOSIMULATION 2: View from Salvador Way looking northeast

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

Although the proposed parking structure can be seen from Los Gamos Drive, the remaining mature vegetation surrounding the structure would reduce visual impacts to views beyond the site. Similarly, the retention of mature trees and landscaping would screen the structure from public vantage points above the site. The proposed project would also require an Environmental and Design Review Permit and consistency with current City of San Rafael General Plan policies and non-residential design guidelines. In addition, the project will be reviewed by the Design Review Board and Planning Commission to evaluate the project's compatibility and harmony with existing development, preservation of existing trees and natural landforms, quality of building materials, and how landscaping would be maintained over time. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 12)

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

Discussion:

Less Than Significant Impact with Mitigation Incorporation: The proposed project would include full occupancy of the existing office building with medical office uses. It is anticipated that medical office usage will include after-hours and potentially weekend activity. The project would occupy the entirety of the building, as compared with the current vacancy of the existing building uses. However, historical patterns of use for 1650 Los Gamos would be similar to the full occupancy for the proposed medical office use. Therefore, the proposed usage of the building would not be introducing a new source of light and glare or affect nighttime views.

The proposed project would require the development of a three-story Parking structure on the parcel across Los Gamos Drive. This would result in the introduction of new sources of interior and exterior lighting, as well as landscape and signage lighting. No new exterior building lighting is proposed for the existing building; however, security lighting for the new parking structure, pedestrian walkways and perimeter security lighting would be included. Although typical LED light standards are noted on the plans, all site lighting would be designed to meet the City of San Rafael minimum illumination standards for safety at all exterior doorways, parking areas and ground level walkways. Specific lighting design would be subject to Design Review Board review and approval and standard City conditions of approval. The following mitigation measure is included to ensure that lighting fixtures that meet building codes specifications are included within the project's building plans:

MM AES-1: Prior to the issuance of any building permits, the project applicant shall submit to the satisfaction of the Community Development Department Director, project building plans that include a photometric lighting study demonstrating that outdoor lighting fixtures meet the requirements of the California Energy Code (known as Part 6, Title 24 of the California Code of Regulations).

With the incorporation of Mitigation Measure AES-1, the impact would be considered less than significant and no further mitigation is required.

(Sources: 3, 4)

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

II. AGRICULTURE AND FOREST RESOURCES

Would the project: {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.} In determining whether impacts to a forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resource Board.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 511104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

conversion of forest land to non-forest use?

Discussion:

No Impact: The project site is located in north San Rafael and is zoned for office development under the current Planned Development (PD 1509) Zoning designation. The site is presently developed with commercial uses and parking areas and is not prime farmland. There are no Williamson Act contracts associated with the subject property, nor is the property zoned for agricultural uses. The proposed project would require the removal of some existing on-site mature trees, but these are not designated as forest land or timberland zoned Timberland Production. There would be no impact.

(Sources: 1, 2, 3)

III. AIR QUALITY

Would the project:

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

Discussion:

Potentially Significant Impact. The project site is in Marin County, which is located within the San Francisco Bay Area Air Basin (SFBAAB). The Bay Area Air Quality Management District (BAAQMD) is responsible for assuring that the Federal and California Ambient Air Quality Standards are attained and maintained in the SFBAAB. The SFBAAB exceeds the state air quality standards for ozone and particulate matter (PM10 and PM2.5). The area is designated nonattainment for national standards of 8-hour ozone, 24-hour PM2.5, and state standards for 24-hour and annual PM10, and annual PM2.5.

The 2010 Clean Air Plan, the regional air quality management plan for the SFBAAB, accounts for projections of population growth provided by the Association of Bay Area Governments (ABAG) and vehicle miles traveled provided by the Metropolitan Transportation Commission (MTC), and it identifies strategies to bring regional emissions into compliance with federal and state air quality standards. BAAQMD encourages local jurisdictions to include General Plan policies or elements that, when implemented, would improve air quality. Although air quality elements are not mandated, general plans are required to be consistent with any air quality policies and programs that exist within that jurisdiction.

For projects, the determination of a significant cumulative air quality impact should be based on the consistency of the project with the Bay Area’s most recently adopted Clean Air Plan. A project would be consistent with the 2010 Clean Air Plan if the project would not exceed the growth assumptions in the plan. The primary method of determining consistency with the 2010 Clean Air Plan growth assumptions is consistency with the General Plan land use designations and zoning ordinance zoning designations for the site. If the General Plan growth forecast was adopted prior to the adoption of the 2010 Clean Air Plan, then it can be safely assumed that the 2010 Clean Air Plan incorporates the growth forecast from the General Plan.

The Clean Air Plan assumptions for projected air emissions and pollutants in San Rafael are based on the land use and development projection assumptions in the San Rafael General Plan 2020 (General Plan). The adopted General Plan land use designation for the project site is Office, which permits general, administrative, and medical office uses. As such, the proposed project would not significantly affect regional vehicle miles traveled pursuant to the CEQA Guidelines (Section 15206) because of its consistency with adopted land use plans in the

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

Potentially Significant Impact: Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. Bright Horizons daycare center and the private Fusion Academy school are located approximately 200 feet from the project site at 1600 Los Gamos Drive. The Mont Marin/San Rafael Park residential neighborhood is located 250 feet west of the proposed parking garage.

Localized Carbon Monoxide Hotspots

The SFBAAB is designated as attainment for carbon monoxide (CO). Emissions and ambient concentrations of CO have decreased dramatically in the SFBAAB with the introduction of the catalytic converter in 1975. No exceedances of the CAAQS or NAAQS for CO have been recorded at nearby monitoring stations since 1991. As a result, the BAAQMD screening criteria notes that CO impacts may be determined to be less than significant if a project is consistent with the applicable congestion management plan (CMP) and would not increase traffic volumes at local intersections to more than 24,000 vehicles per hour for locations in heavily urban areas, where “urban canyons” formed by buildings tend to reduce air circulation. Based on the scope of the proposed project (reuse of an existing approximately 148,000 square-foot building from general office to medical office use), traffic would increase along surrounding roadways during long-term operational activities. New net daily trips could be generated as a result of the project, which could lead to CO-related effects. However, according to the DTIA for the proposed project, the entire project would generate approximately 5,400 net new daily trips. Therefore, the project would could generate a significant number of vehicle trips and effects related to CO concentrations would be analyzed in a full EIR. As such, this threshold will be discussed in the EIR for the proposed project.

parking structure Hotspots

Carbon monoxide concentrations are a function of vehicle idling time, meteorological conditions, and traffic flow. Therefore, parking structures tend to be of concern regarding CO hotspots, as they are enclosed spaces with frequent cars operating in cold start mode. Approximately 511 parking spaces would be constructed within the proposed parking structure. The proposed project would be required to comply with the ventilation requirements of the International Mechanical Code (Section 403.5 [Public Garages]), which requires that mechanical ventilation systems for public garages operate automatically upon detection of a concentration of carbon monoxide of 25 ppm by approved detection devices. The 25-ppm trigger is the maximum allowable concentration for continuous exposure in any eight-hour period according to the American Conference of Governmental Industrial Hygienists. The proposed design of the parking structure includes three full levels of parking with open ends. As such, the parking structure would most likely not require mechanical ventilation. Impacts in regards to parking structure CO hotspots would be considered less than significant.

Risk and Health Hazards

According to Section 39655 of the California Health and Safety Code, a toxic air contaminant (TAC) is “an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health”. In addition, substances that have been listed as Federal hazardous air pollutants (HAPs) pursuant to Section 7412 of Title 42 of the United States Code are TACs under the State’s air toxics program pursuant to Section 39657 (b) of the California Health and Safety Code. TACs can cause various cancers, depending on the particular chemicals, their type, and duration of exposure. Additionally, some of the TACs may cause other health effects over the short or long term. TACs of particular concern for posing health risks in California are acetaldehyde, benzene, 1-3 butadiene, carbon tetrachloride, hexavalent

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

chromium, para-dichlorobenzene, formaldehyde, methylene chloride, perchlorethylene, and diesel particulate matter.

The proposed medical office building would not generate TACs that would pose a possible risk to off-site uses. Any possible TAC impacts would result solely from construction. Combustion emissions from construction equipment would be generated during project construction and could expose sensitive receptors to diesel particulate matter (DPM) and other TACs. DPM exhaust emissions for project construction from off-road heavy equipment were calculated using CalEEMod.

The BAAQMD's Recommended Methods for Screening and Modeling Local Risks and Hazards (May 2011) was used to complete this screening-level health risk assessment. The BAAQMD recommends a two-tiered approach for screening-level health risk assessments: a screening-level dispersion model is initially applied to project emissions using generally over-predictive assumptions and if the predicted health risk is not within acceptable levels, then a more sophisticated dispersion modeling is necessary.

A screening-level individual cancer analysis was conducted to determine the maximum PM2.5 concentration from diesel exhaust. This concentration was combined with the DPM exposure unit risk factor to calculate the inhalation cancer risk from project-related construction activities at the closest sensitive receptor. The EPA AERSCREEN air dispersion model was used to evaluate concentrations of DPM and PM2.5 from diesel exhaust. The AERSCREEN model was developed to provide an easy to use method of obtaining pollutant concentration estimates and is a single source Gaussian plume model, which provides a maximum one-hour ground-level concentration.

Because construction methods have not been fully evaluated, the proposed project may potentially result in air quality impacts. This threshold will be discussed in the EIR for the proposed project. The EIR will analyze potential traffic and construction mitigation measures, as well as potential temporary and cumulative mitigation measures appropriate to reduce potential air quality impacts to less than significant levels.

(Sources: 1, 2, 3, 4, 5, 18)

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

Discussion:

No Impact. The proposed medical office use would be consistent with surrounding uses and long-term operation of the building would not create objectionable odors. There would be no impact.

(Sources: 1, 2, 3)

IV. BIOLOGICAL RESOURCES

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

the California Department of Fish and Game
or U.S. Fish and Wildlife Service?

Discussion:

No Impact. The project site consists of two parcels totaling approximately 11-acres separated by Los Gamos Drive. The 4.09-acre eastern parcel is fully developed with an office building, surface parking lots and landscaped areas. The 7.02-acre western parcel is partially developed with surface parking lot, sidewalks and landscaped areas. The undeveloped areas of this parcel include hillsides with slopes up to 50 percent. Vegetation on the slopes consists of oak woodland with some open grassland patches. Dense riparian vegetation occurs along an unnamed creek that runs along the northeast edge of the property. This is an intermittent creek that drains to Gallinas Creek on the east side of Highway 101, which drains to San Pablo Bay.

Garcia and Associates (GANDA) conducted a biological site assessment and determined that there are no sensitive or special status species adjacent to the proposed project site. GANDA completed the background review and site visit for the proposed project on March 14, 2016. The background review included querying the California Natural Diversity Database (CNDDDB; Figure 2); for records of special status species; requesting a species list from the Sacramento Office of the United States Fish and Wildlife Service (USFWS) generated using their Information, Planning, and Conservation System (IPaC); querying the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants list for the Novato 7.5 minute quadrangle map and reviewing the National Wetlands Inventory. Although several special status species were identified during this search, no occurrences were located on the property and no suitable habitat was identified in the proposed project footprint that could support any of these species or sensitive habitat types. Although some mature landscaping trees would be removed as part of the proposed project, these trees do not constitute suitable contiguous vegetation that would support special status species. As proposed, the Project would not include development or construction outside the limits of existing disturbance or impervious surfaces. For these reasons, there would be no impact and no mitigation would be required.

(Sources: 1, 3, 4, 10)

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

Discussion:

Less Than Significant Impact: An unnamed creek runs along the northeast edge of the 1650 Los Gamos Drive property. This intermittent creek drains to Gallinas Creek on the east side of Highway 101, which drains to San Pablo Bay. The creek is culverted within the neighborhoods north of the property, but is open, then culverted, and then open again in the area within the proposed project site. The creek has a natural substrate bottom in the areas which are daylighted and is in relatively good condition. GANDA conducted a survey on March 14, 2016 following a week of rain, and the creek was flowing. The creek was estimated to be approximately 20 feet wide at the Ordinary High Water Mark (OHWM) at the culvert leading under Los Gamos Drive (see attached GANDA Photos 1 and 2).

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

On the west side of Los Gamos Drive, the creek is lined with riparian vegetation dominated by coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), California bay (*Umbellularia californica*), arroyo willow (*Salix lasiolepis*) and California buckeye (*Aesculus californica*). The understory includes poison oak (*Toxicodendron diversilobum*), California blackberry (*Rubus ursinus*), vetch (*Vicia* sp.), English ivy (*Hedera helix*), Cape ivy (*Delairea odorata*), French broom (*Genista monspessulana*), Italian thistle (*Carduus pycnocephalus*) and soft chess (*Avena* sp.). On the east side of Los Gamos Road, the creek emerges from an approximately 500-foot long, 36” inch diameter cement culvert that is lined with arroyo willow, Himalayan blackberry (*Rubus armeniacus*), French broom, English Ivy, and annual grasses. Within the creek bed dense stands of cattails (*Typha* sp.) were present. The creek was estimated to be approximately 15-20 wide at the OHWM where it emerges from the culvert (see attached GANDA Photos 3 and 4).

The proposed project footprint of disturbance lacks riparian and wetland habitat and does not support any other sensitive natural communities. No work is currently proposed that would modify or impact the channel of the unnamed intermittent tributary to Gallinas Creek. The proposed project site of both buildings and parking lots are serviced by an existing stormwater drainage system managed by the City of San Rafael. Proposed infrastructure and improvements would connect with existing facilities located within the right of way or Los Gamos Drive and would not be dispersed into the intermittent channel.

As proposed, the only physical improvement included in the proposed project would be the construction of the parking structure. However, analysis and discussion in the DTIA provided by Fehr & Peers indicates the need for intersection improvements at Los Gamos Drive and Lucas Valley Road. These improvements include signalization of the intersection, providing multiple through and turns lanes, and crosswalks and sidewalks for pedestrians. The General Plan requires that new projects maintain a minimum 50-foot development-free setback from wetlands, including, but not limited to, paving or structures. However, General Plan Policy CON-6. Creek and Drainageway Setbacks (a) establishes a 25-foot top of creek bank setback for all new development. The proposed improvements, including site development for the parking structure, would be set back approximately 120 feet from the intermittent tributary to Gallinas Creek. Additionally, the preliminary design for the potential intersection indicates that improvements would be located within the existing footprint of disturbance and would not require widening the intersection to the west or northwest.

Implementation of the General Plan Policy CON-6. Creek and Drainageway Setbacks (a) and (b) would establish setbacks for future improvements as a result of the proposed project including the intersection upgrade at Los Gamos Drive and Lucas Valley Road. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 10)

- 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?

Discussion:

Less Than Significant Impact. See discussion in IV (b) above. The project footprint lacks riparian and wetland habitat. The northeastern boundary of the project area has an unnamed intermittent tributary to Gallinas Creek;

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

however, no work is proposed that would modify or impact this channel. Per the San Rafael General Plan, CON-6. Creek and Drainageway Setbacks, no structures or development is allowed within 25 feet of the top of creek banks. Based on the proposed project design and preliminary recommendation for intersection improvements at Los Gamos Drive and Lucas Valley Road, no structures or development would be located within 25 feet of the unnamed intermittent channel. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 10)

- 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?

Discussion:

Less Than Significant Impact with Mitigation Incorporation: See discussion in IV(a) and (b) above. GANDA conducted a biological site assessment of the subject property on March 14, 2016. The proposed project footprint would primarily be kept to the existing developed building and parking lot areas. With implementation of BMPs including erosion control, wildlife exclusion fencing, biological monitoring and protection of sensitive resources, impacts to wildlife species may be avoided. The northeastern boundary of the project area has an unnamed intermittent tributary to Gallinas Creek; however, no work is proposed that would modify or impact this channel. Due to the intermittent nature of this channel, it is not likely to support any native resident fish species. Because the project site is currently developed and the proposed new development is within this developed footprint, no interference with any migratory wildlife corridors or native wildlife nursery sites will occur.

However, the project area, including the landscaped ornamental vegetation and the existing building structure, may support nesting birds and roosting bats. To mitigate impacts to these species, implementation of the following mitigation measure would reduce potential impacts to less than significant levels:

MM BIO-1: Prior to issuance of a grading or building permit, the Project sponsor shall conduct a preconstruction nesting bird and bat survey. Preconstruction surveys shall include the following:

- 1) Perform any vegetation trimming and/or removal outside of the bird nesting season (Sept. 1 – Feb. 14);
- 2) Provide a worker environmental awareness training for construction personnel;
- 3) Perform preconstruction surveys for nesting migratory birds by a qualified biologist no more than 72 hours prior to the start of construction for activities occurring during the breeding season (February 15 to August 31); and
- 4) If work is to occur within 300 feet of active raptor nests or 50 feet of active passerine nests, non-disturbance buffers will be established at a distance sufficient to minimize disturbance.

(Sources: 1, 3, 4, 10)

- e. Conflict with any local policies or ordinances

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

protecting biological resources, such as a tree preservation policy or ordinance?

Discussion:

Less Than Significant Impact: The project site contains over 300 existing trees, including native oaks and redwoods, and other landscape varieties. Urban Forestry Associates (“UFA”) conducted a survey of the project site and identified 274 trees within the planned building envelope for the proposed project that could potentially be impacted by proposed improvements. Of the 274 trees surveyed by UFA, 61 have significance, due to size, and unique character in this locale. The landscape plan (Sheet L-105) indicates an additional 19 trees could be impacted due to their location, resulting in canopy reduction or root zone impacts. UFA provided an arborist report which included recommendations for a Tree Protection Zone (TPZ) to preserve remaining trees on site within the limits of disturbance.

Several mature redwood trees used as screen trees at the west of the parking structure would be retained as part of the proposed project. Furthermore, the balance of the parking structure parcel would remain untouched including mature native and landscaping trees. The proposed project includes 31 replacement trees to the north and east of the proposed parking structure. Although the City’s Environmental and Design Review Permit Review Criteria (SRMC Section 14.25.050.G) requires preservation of trees and or equal numbers of replacement trees, revegetating the site with an additional 30 trees would over-burden the available planting areas and increase fire fuel load. As the proposed project is located within a Wildland Urban Interface zone, the proposed replanting plan is consistent with the general requirements of the SRMC. For these reasons, the impact would be considered less than significant and no further mitigation would be required.

(Sources: 2, 3, 10)

- 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?

Discussion:

No Impact: There are no Habitat Conservation or Natural Community Conservation Plans within the project area. See discussion above in IV(a). Proposed improvements are specific to the new parking structure and the intersection upgrade at Los Gamos and Lucas Valley Road. Per the biological constraints analysis, no sensitive habitats or species would be impacted by the proposed project. For these reasons, there would be no impact and no mitigation would be required.

(Sources: 1, 3, 4, 10)

V. CULTURAL RESOURCES

Would the project:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

Discussion:

No Impact: The proposed project involves amending the current PD zoning to allow medical office uses in the existing building. The existing building was constructed in 1979 and does not meet criteria as defined in CEQA Guidelines Section 15064.5. No physical improvements are proposed to the existing office building, with the exception of updated exterior finishes and branding related to Kaiser Permanente. A new three-story parking structure is proposed to meet current City standards for parking requirements. Modifications to surface parking areas, including new landscaping, would be required for parking upgrades. A signalized intersection would be constructed at Los Gamos and Lucas Valley Road, but would be generally contained to areas of existing site disturbance.

No structures would be modified or removed to facilitate the required parking and circulation improvements. Based on the results of the cultural resources investigation conducted for the proposed project, no cultural resources have been identified within the project area. The existing building, culverts, and drainage system, is associated with the development of the property in the 1980s. Since they are not more than 45 years old, they are not considered cultural resources and there would be no impacts to historical resources as defined in Section 15064.5. Therefore, there is no impact and no mitigation is required.

(Sources: 1, 3, 4, 9, 21, 22)

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Discussion:

Less Than Significant Impact with Mitigation Incorporation: According to both the City of San Rafael’s adopted Archaeological Sensitivity Map and “PastFinder”, a citywide database of parcel-specific archaeological sensitivity reports for development proposals that involve excavation or grading, the parcels that comprise the project site have a sensitivity rating of “low” and no archaeological consultation is recommended prior to initiating a permitted project.

Based upon this preliminary cultural resource investigation, the chance of unknown archaeological resources being uncovered during excavation, grading or construction is remote. However, given the proximity of the site to a creek, an archeological investigation was prepared.

GANDA conducted an archaeological investigation of the subject property and prepared a written report on May 14, 2017. GANDA archaeologist Robin Fies, M.A., conducted a records search for a 0.2-mile radius around the Project Area, at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University, Rohnert Park (File No. 15-1354). The following sources were consulted during the records search:

1. NWIC base map: USGS 7.5-minute series topographic quadrangle of Novato, California (1980).
2. Survey reports from previous cultural resources investigations and cultural resources site records to identify recorded archaeological sites and built environmental resources (i.e., buildings, structures, and objects) located within a 0.25-mile radius of the APE.

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

3. California Office of Historic Preservation (OHP) sources, including the California Inventory of Historic Resources (1976), California Archaeological Determinations of Eligibility (2012a), and the Historic Properties Directory (2012b), which combines cultural resources listed as California Points of Historical Interest and California Historical Landmarks and those that are listed in or determined eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR).

Records Search Results

The records search indicates that two cultural resources investigations have been completed within or directly adjacent to the project area: Chavez 1979 and Darko 2014. Additionally, the records search indicated that eight cultural resources investigations have been completed within a 0.25-mile radius of the project area. The records search did not result in the identification of previously recorded cultural resources in or within a 0.25-mile radius of the project area; however, three prehistoric cultural resources were identified within a 0.5-mile radius of the project area along Miller Creek. None are located within or adjacent to the project area, but rather demonstrate the sensitivity of the area around Miller Creek for prehistoric, Native American resources.

Field Survey Results

Most of the project area is covered by an asphalt parking lot. Areas of natural ground surface were present to the north, west and south of the parking lot. The project area is generally hilly with slopes ranging from 10-30 degrees. The area is grass covered and vegetated in some places with brush, trees, and poison oak. Ground visibility is generally poor, ranging from 0-25 percent, and pockets of exposed soils were examined for artifacts. Las Gallinas Creek runs through the northeastern portion of the project area and through a culvert under Los Gamos Drive. The creek is deeply incised and cuts through hilly areas. The exposed banks within the project area were examined for cultural materials but none were observed. Concrete-lined drainage ditches that feed runoff from Salvador Way up slope down to Las Gallinas Creek and run through the project area. No archaeological materials or sites were observed during the survey.

Based on the results of the cultural resources investigation conducted for the proposed project, no prehistoric or historic-period archaeological resources were identified within the project area.

Although construction of the proposed project would have no impact on known archaeological resources, there is a possibility that previously unidentified archaeological resources and subsurface deposits are present within the project area. If present, excavation, grading, and movement of heavy construction vehicles and equipment could expose, disturb or damage any such previously unrecorded archaeological resources. Because the possibility of encountering archaeological resources during construction cannot be completely discounted, the impact related to the potential disturbance or damage of previously undiscovered archaeological resources, if present, could be significant.

MM CULT-1: Protect Archaeological Resources Identified during Construction: The project sponsor shall ensure that construction crews stop all work within 100 feet of the discovery until a qualified archaeologist can assess the previously unrecorded discovery and provide recommendations. Resources could include subsurface historic features such as artifact-filled privies, wells, and refuse pits, and artifact deposits, along with concentrations of adobe, stone, or concrete walls or foundations, and concentrations of ceramic, glass, or metal materials. Native American archaeological materials could include obsidian and chert flaked stone tools (such as projectile and dart points), midden (culturally derived darkened soil containing heat-affected rock, artifacts, animal bones, and/or shellfish remains), and/or groundstone implements (such as mortars and pestles).

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

Implementation of MM CULT-1 (Protect of Archaeological Resources Identified during Construction) would reduce impacts on any previously unrecorded and buried archaeological resources to less-than significant-levels by requiring the Project proponent and its contractors to adhere to appropriate procedures and protocols for minimizing such impacts, in the event that a possible archaeological resource is discovered during construction. Following construction, operation of the proposed project would not result in further ground disturbance within the project area. Therefore, no operational impacts to archaeological resources would occur.

Impacts to previously unidentified archaeological resources within the project area would be reduced to a less-than-significant level and no further mitigation is required.

(Sources: 1, 3, 4, 9, 21, 22)

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

Discussion:

No Impact: No known unique paleontological or geologic features have been identified within the project area or on the subject site. A search of the University of California Museum of Paleontology conducted on May 2, 2017 did not yield known fossil localities or unique geologic features within or near the project site. As no unique geologic features were identified in the archival study, no further study is necessary and there is no impact.

(Sources: 1, 3, 4, 9, 21, 22)

- d. Disturb any human remains, including those interred outside of dedicated cemeteries?

Discussion:

Less Than Significant Impact with Mitigation Incorporation: See discussion in V (b) above. There are no formal cemeteries or known interred human remains within the project area or on the subject site. No evidence of human remains was identified within the project area. However, the potential for their presence cannot be entirely ruled out. Construction-related excavation could expose and disturb or damage previously undiscovered human remains.

Therefore, to reduce the potential disturbance of unknown human remains during construction to less than significant levels, the following mitigation measure is proposed:

MM CULT-2: Protect Human Remains Identified During Construction: The Project proponent shall treat any human remains and associated or unassociated funerary objects discovered during soil-disturbing activities according to applicable State laws. Such treatment includes work stoppage and immediate notification of the Marin County Coroner and qualified archaeologist, and in the event that the Coroner’s determination that the human remains are Native American, notification of NAHC according to the requirements in PRC Section 5097.98. NAHC would appoint a Most Likely Descendant (“MLD”). A qualified archaeologist, Project proponent, County of Marin, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

(CEQA Guidelines Section 15064.5[d]). The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 48 hours to reach agreement on these matters.

MM CULT-2 would be implemented during project construction to minimize potential impacts on any buried human remains and associated or unassociated funerary objects that may be accidentally discovered during construction activities to less-than-significant levels by requiring the District to adhere to appropriate excavation, removal, recordation, analysis, custodianship, and final disposition protocols. Therefore, implementation of MM CULT-2 would reduce this potential impact on buried human remains to less than significant and no further mitigation is required.

(Sources: 1, 3, 4, 9, 21, 22)

VI. GEOLOGY AND SOILS

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.

The project applicant contracted the services of Geosphere Consultants, Inc. of San Ramon, CA, to evaluate the subsurface conditions at the site and prepare geotechnical recommendations for the proposed new parking structure and roadway widening associated with potential mitigation that may be required for the proposed project. The Geosphere Geotechnical Engineering and Geologic Hazards (GEGH) study provides recommendations for foundations, lateral earth pressures, seismic design parameters, interior and exterior concrete slabs, site preparation, grading, foundation excavation, drainage, utility trench backfilling, and pavement design related to the parking structure and roadway widening and limited surface improvements around the existing building.

Discussion:

No Impact: The subject site is located within the tectonically active and geologically complex northern Coast Ranges but is not mapped within an Alquist-Priolo Earthquake Fault Zone. The northern Coast Ranges were segmented into a series of tectonic blocks separated by major faults including the San Andreas, Rodgers Creek, Hayward, and Calaveras. The project site is situated between the active Rodgers Creek and San Andreas faults, but no known active faults with Holocene movement (last 11,000 years) lie within the limits of the site. In the

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

event of a major earthquake in the Bay Area, the site may be susceptible to seismic shaking and related ground failure. However, surface rupture is highly unlikely at this site since no active faults are known to cross the project site and the site is not located within the Alquist-Priolo Earthquake Fault Zone. There would be no impact.

(Sources: 1, 3, 4, 6, 15)

ii) Strong seismic ground shaking?

Discussion:

Less Than Significant Impact: As discussed in the proposed project’s Geotechnical Investigation, strong seismic ground shaking at the site is highly probably during the life of the project. The site will likely experience severe ground shaking from a major earthquake originating from the major active Bay Area faults, particularly the nearby San Andreas Fault (approximately 10.5 miles from the site) or Hayward-Rodgers Creek Fault (approximately 8.5 miles from the site). The intensity of ground shaking will depend on the characteristics of the causative fault, distance from the fault, the earthquake magnitude and duration, and site-specific geologic conditions. The report concludes that the project improvements should be designed in accordance with the California Building Code and recommended seismic design parameters provided in the Table 6.2.1 of the GEGH study. Furthermore, construction level designs would be reviewed and approved by the City of San Rafael pursuant to the most current CBC regulations and standards. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 6, 15)

iii) Seismic related ground failure, including liquefaction?

Discussion:

Less Than Significant Impact: Liquefaction refers to the sudden, temporary loss of soil strength during strong ground shaking. Research and historical data indicate that soil liquefaction generally occurs in saturated, loose granular soil (primarily fine to medium-grained, clean sand deposits) during or after strong seismic ground shaking and is typified by a loss of shear strength in the affected soil layer, thereby causing the soil to flow as a liquid. However, because of the higher inter-granular pressure of the soil at greater depths, the potential for liquefaction is generally limited to the upper 40 feet of the soil. Potential hazards associated with soil liquefaction below or near a structure include loss of foundation support, lateral spreading, sand boils, and areal and differential settlement. Lateral spreading is lateral ground movement, with some vertical component, as a result of liquefaction. Lateral spreading can occur on relatively flat sites with slopes less than two percent under certain circumstances. Lateral spreading can cause ground cracking and settlement.

The project site is not currently within the State of California Special Study Zones. However, as indicated on the Marin Map GIS online mapping tool and the liquefaction hazard susceptible map regenerated by Association of Bay Area Governments (ABAG) based on the United States Geological Survey (USGS), the site is located at the boundary between a zone of very low to low and moderate liquefaction potential. These conditions are also included in Figure 6, Liquefaction Susceptibility Map of the Geosphere GEGH study. The site is predominantly

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

underlain by a layer of shallow very stiff to hard sandy clay to highly weathered, fractured bedrock. Groundwater was not encountered in any of the borings (up to a depth of 27 feet below the existing ground surface). Based on the information collected during the field investigation, laboratory test results, dense nature of the soils encountered in the borings within the project site, and great depth to groundwater, Geosphere concluded that the potential for liquefaction to occur at the project site is not likely. Soil tests at the project site indicate that ground settlement of the near surface soils in a seismic event would be minor. Lurching and ground cracking generally occur along the tops of slopes and the site is located on relatively flat ground, thus the potential for significant lurching and ground cracking is low. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 6, 15)

iv) Landslides?

Discussion:

Less Than Significant Impact: The project site, including existing office building, is located on an area mainly defined as surficial deposits and not susceptible to landsliding. However, the proposed parking structure site is located in an area defined as few landslides per the Marin Map GIS online mapping database. The parking structure would be constructed on an area previously developed with a surface parking lot but will require excavation and cuts to construct the foundations for the structure. The Geosphere GEGH study includes recommendations for project construction including criteria for foundations, slabs and retaining walls. Furthermore, the risk of slope instability is reduced by adhering to relevant CBC requirements for grading and building design. Therefore, the impact is considered less than significant and no mitigation is required.

(Sources: 3, 5, 6, 15)

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

Discussion:

Less Than Significant Impact: Sandy soils on moderate slopes or clayey soils on steep slopes are susceptible to erosion when exposed to concentrated surface water flow. The site is relatively level with little relief thus the potential for significant erosion at the site is minimal. Project development would cover the entire site with the proposed structure and landscaping improvements. As proposed, the civil plans collect surface water into a storm drain system to temporary retention systems onsite and into the City storm drainage system. Erosion control measures during and after construction would be required to conform to the City of San Rafael Public Works Department (DPW) Grading and Construction Erosion and Sediment Control Plan Permit Application Package and the Regional Water Quality Control Board standards. Conditions of approval would be included in project approvals requiring adherence to the various local and regulatory agencies permitting procedures. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 6)

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

Discussion:

Less Than Significant Impact: The Geosphere GEGH study describes lateral spreading as lateral ground movement, with some vertical component, as a result of liquefaction. The soil rides on top of the liquefied layer. Lateral spreading can occur on relatively flat sites with slopes less than two percent under certain circumstances. Lateral spreading can cause ground cracking and settlement. The project site is not currently within the State of California Special Study Zones. However, per the liquefaction hazard susceptible map regenerated by ABAG based on the USGS and William Lettis & Associates, the site is located at the boundary between a zone of very low to moderate liquefaction potential (see Geosphere Figure 6, Liquefaction Susceptibility Map). The site is predominantly underlain by a layer of shallow very stiff to hard sandy clay to highly weathered, fractured bedrock. Groundwater was not encountered in any of the borings (up to a depth of 27 feet below the existing ground surface).

Withdrawal of groundwater and other fluids (i.e. petroleum and the extraction of natural gas) from beneath the surface has been linked to large-scale land subsidence and associated cracking on the ground surface. Other causes for ground cracking and subsidence include the oxidation and resultant compaction of peat beds, the decline of groundwater levels and consequent compaction of aquifers, hydro-compaction and subsequent settlement of alluvial deposits above the water table from irrigation, or a combination of any of these causes. These factors were not observed at the project site.

The result of the laboratory testing performed on representative sample of the near-surface soils indicated low plasticity soils. Subsurface deposits encountered during the drilling program generally consisted of stiff to hard or medium dense to very dense clay, clayey sand, and bedrock. Collapsible soils are loose chemically bonded fine sandy and silty soils that have been laid down by the action of flowing water, usually in alluvial fan deposits. Terrace deposits and fluvial deposits can also contain collapsible soil deposits. The soil particles are usually bound together with a mineral precipitate. The loose structure is maintained in the soil until a load is imposed on the soil and water is introduced. The water breaks down the inter-particle bonds and the newly imposed loading densifies the soil. These types of soils are not present at this site

Based on the information collected during the field investigation, laboratory test results, dense nature of the soils encountered in the borings within the project site, and great depth to groundwater, Geosphere concluded that there is low potential for liquefaction, subsidence or related ground cracking, and/or collapsible soils at the project site. For these reasons the potential impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 6)

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

(1994), creating substantial risks to life or property?

Discussion:

Less Than Significant Impact: See Response VI (c) above. The Geosphere GEGH study indicates that expansive soils were not observed during their field investigations of the project site and state that the potential for structural damage due to expansive soils is low. Therefore, the potential impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 6)

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

Discussion:

No Impact: The project site is located in north San Rafael where sewer disposal systems are in place. The project site is currently served with existing sewer service. The proposed project does not include septic tanks or alternative wastewater disposal systems. There would be no impact.

(Sources: 1, 3, 4, 6, 13)

VII. GREENHOUSE GAS EMISSIONS

Would the project:

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

Discussion:

Potentially Significant Impact. In 2011, the City of San Rafael adopted a new Sustainability Element for General Plan 2020 that contains a Climate Change Action Plan (CCAP). The CCAP includes goals to achieve Greenhouse Gas (GHG) emissions level reductions by 2025 and 2050 that exceed the State’s goals under AB 32.

City of San Rafael GHG Emissions Reduction Strategy

In 2011, the City of San Rafael prepared a GHG Emissions Reduction Strategy to provide technical support to the San Rafael General Plan 2020 (new Sustainability Element) and the 2009-adopted CCAP. This strategy serves as technical appendix (CCAP Appendix E) to the adopted CCAP and meets the BAAQMD requirements for a Qualified GHG Emissions Reduction Strategy. The strategy was adopted by the City Council in July 2011 and includes the following:

- An updated GHG emissions inventory. The initial inventory prepared for the CCAP using the ICLEI modeling program has been updated using more current methodologies for calculating vehicle miles traveled (VMT) and associated emissions. Methane emissions

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

associated with waste disposal were updated using the California Air Resources Board (CARB) Landfill Emission Tool. Stationary sources of emissions have been included in the inventory update per the BAAQMD guidelines and thresholds. The strategy discloses that community-wide GHG emissions in 2005 were 412,804 metric tons of CO₂ equivalents (MTCO₂e), with 43% of this amount attributed to transportation. This emission estimate is considered the “baseline” for future reduction goals.

- GHG emission projections through year 2035 (consistent with target date set by Senate Bill 375). The projections rely on ABAG projections of housing, population, and employment growth within the City by 2020 (per Senate Bill 32) and 2035 (per Senate Bill 375), as well as Metropolitan Transportation Commission’s (MTC) county-specific growth estimates of VTM for Marin County. Based on projected growth, annual emission forecasts under “business as usual” conditions (no application of GHG reduction measures) are estimated at 494,824 MTCO₂e by 2035 (19.87% increase).
- Identification of reduction targets. SB 32 and the adopted CCAP target a 25% reduction in 2005 baseline GHG emissions by 2020. For San Rafael, the annual emission reduction target is 385,282 MTCO₂e for 2020 and 380,765 MTCO₂e by 2035.
- Application of reduction measures from CCAP. The strategy quantifies numerous reduction measures from CCAP programs such as: implementing transit-oriented development; participation in Marin Clean Energy; SMART rail service; increased transit service; implementing transportation demand management; promoting alternative and fuel efficient vehicles; promoting zero waste; implementation of Green Building codes; and promoting affordable housing.
- Providing a GHG Emission Reduction Summary. Based on application of the reduction measures and projected growth, estimated annual emissions can be reduced by 56,858 MTCO₂e by 2020 and 78,382 MTCO₂e by 2035.

Application to new development projects consistent with the San Rafael General Plan 2020.

In order to meet the reduction targets, new construction projects must be determined to be consistent with the GHG Emissions Reduction Strategy. A checklist has been developed to be used in reviewing new development applications, to ensure that GHG reduction measures are incorporated into the project design and operation. Project compliance with the measures in the checklist would exempt individual, quantitative study of GHG emissions for an individual development project. Development projects that are not able to meet the standards in the checklist, or projects that propose an amendment to the San Rafael General Plan (e.g., a change in land use that results in changes to the projections used in the strategy) would require an individual, quantitative GHG emissions assessment.

The project proposes land uses that are permitted by the San Rafael General Plan. Because the proposed project includes the conversion of approximately 148,000 square feet of office space to medical office uses, a quantitative analysis of the new building will be prepared to evaluate the effects of additional peak hour and daily vehicle trips.

Project-related GHG emissions would include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of CO₂, N₂O, and CH₄, and would not result in other GHGs that

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions.

This Initial Study provides a preliminary analysis to identify the impacts of the project upon GHG emissions considerations. Because a comprehensive analysis of traffic, construction and operational activities has not yet been undertaken, the proposed project may potentially result in GHG impacts. This threshold will be discussed in the EIR for the proposed project. The EIR will analyze potential mitigation measures, as well as potential temporary and cumulative mitigation measures appropriate to reduce potential GHG emission impacts to less than significant levels.

(Sources: 1, 2, 3, 4, 5, 12)

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

Discussion:

Potentially Significant Impact. See discussion in VII(a). above.

(Sources: 1, 2, 3, 4, 5, 12)

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Discussion:

Less Than Significant Impact. The proposed project includes the reuse of an existing three-story office building from general office uses to medical office use. It is anticipated that the transport of medical equipment and medical waste would occur. Medical and administrative activities would utilize and store hazardous materials typical in medical office and professional office environments. Common office chemicals such as toners, paints, lubricants, hand sanitizer, and kitchen as well as office and restroom cleaners would be used. Additional hazardous and biohazardous materials would be used during patient care, laboratory testing and medical diagnostics activities, as well as for facilities maintenance tasks. These products could potentially include fuels, liquid oxygen, waste oil, battery waste, various liquid medical use chemicals such as skin prep, tissue fixative and medications, and radioactive materials. In addition, the proposed project would include use of a diesel-powered emergency back-up generator. This generator would be located within the existing building footprint and would only be used during emergencies or when being tested (typically, monthly).

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

Because of the potential health and safety risks of the above hazardous materials, medical facilities such as the proposed project are required to comply with specific federal, state, and local laws and regulations regarding the transportation, storage, use, and disposal of chemical and other materials considered a risk to public health. As a result, areas within the proposed medical office building that contain hazardous chemicals, gases or bio-hazards must be equipped with proper ventilation and secondary spill containment. In addition, flammable materials greater than 5-gallons stored indoors would be kept in fire safety cabinets when not in use. Hazardous materials would be stored in original containers until usage. The hazardous materials would also be stored in locations in each building according to compatibility and in storage enclosures (i.e., flammable material storage cabinets and biological safety cabinets) or in areas or rooms specially designed, protected, and for such storage. Hazardous materials would only be used by personnel that have been trained in the handling and use of the material and that have received proper hazard-communication training. Hazardous materials planning and reporting requirements under the California Hazardous Materials Business Planning, California Proposition 65 notification, and Emergency Planning and Community-Right-to-Know Act would be initiated and completed, as required, for acute care facilities. The proposed project's emergency back-up generator would be subject to the requirements of the California Fire Code, which includes placement limitations and fuel capacity limits. Compliance with specific federal, state, and local hazardous waste laws and regulations would reduce the risk of hazard and hazards to workers, the public, and the environment, such that they would not pose a threat to project occupants or the public. Furthermore, the project plans have been reviewed by City Departments, including Public Works, Police and Fire. Construction activities on the site would not involve materials hazardous to the public. Project development would be subject to City requirements for construction activities including management and transportation of debris disposal and recycling. All construction activities would be subject for inspection by the City.

The proposed project would not involve routine transport, use or disposal of hazardous materials and would not create a significant hazard to the public. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 3, 4, 6, 8, 13)

- 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?

Discussion:

Less Than Significant Impact. See discussion in VIII (a) above. The proposed project would not include the use of hazardous materials. Although the proposed project includes the routine use and transport of materials and medical waste, these would not be of the type and/or quantity that would be considered hazardous. Furthermore, laws, regulations, and standards administered through the federal Resource Conservation and Recovery Act of 1976 (RCRA), California Occupational Safety and Health Administration (Cal/OSHA), California Department of Transportation, California Department of Health Services (CDHS), California Environmental Protection Agency (Cal EPA), and the California Fire Code would ensure that the proposed project would implement current safeguards and standards to reduce the risk or chemical and hazardous material exposure at the project site and surrounding environment. The project would not 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

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

environment. For these reasons, the potential impact is considered less than significant and no mitigation is required.

(Sources: 3, 4, 8, 13)

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

Discussion:

Less Than Significant Impact. See discussion in VIII (a) and (b) above. There is a childcare facility (Bright Horizons at Marin Commons) and a private middle and high school (Fusion Academy) located within a ¼ mile of the project site at 1600 Los Gamos Drive. Federal, state and local laws, regulations, and standards would ensure that the proposed project would implement current safeguards and standards and reduce the risk of hazard and hazards to the public, such that they would not pose a threat to project occupants or the sensitive receptors within ¼ mile of the proposed project site. For these reasons, the impacts are considered less than significant and no mitigation is required.

(Sources: 3, 4, 8, 13)

- 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?

Discussion:

No Impact: The project site is located within North San Rafael Commercial Center and is not included on a list of hazardous material sites. The project applicant had a Phase I Environmental Site Assessment prepared by Stantec in February 2016. The Phase I report provided research of potential underground storage tanks and concluded there are no such conditions on the project site. For these reasons, there would be no impact.

(Sources: 1, 3, 4, 8, 13)

- 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?

Discussion:

No Impact: The project site is located within North San Rafael Commercial Center and is not within two miles of a public airport nor located within an airport land use plan. The nearest public airport, Marin County Airport - Gness Field in Novato, is approximately 8 miles north of the project site. There would be no impact.

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

(Sources: 1, 3, 4, 8, 13)

- 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?

Discussion:

Less Than Significant Impact: The project site is approximately one-mile west of the private airstrip, San Rafael Airport, in North San Rafael. However, the proposed project includes the conversion of existing office building to medical office uses and only includes minor exterior modifications to the existing building. A parking garage would be constructed in an area previously developed with surface parking. The existing building is not located within the flight path of the San Rafael Airport, nor is located within the noise contours for the airstrip. Construction of the proposed project would not introduce persons to flight paths for the airport. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 8, 13)

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

Discussion:

No Impact: The proposed project, a reuse of an existing office building for medical office uses, located within North San Rafael Commercial Center, would be consistent with the General Plan and Zoning Ordinance in terms of the types of land uses, including general office and medial office. The proposed project has been reviewed by City Departments, including Public Works, Fire, and Police and responsible agencies. No concerns have been raised about the City’s ability to provide continuing services to the project site nor that it would interfere with and adopted emergency response or evacuation plan. There would be no impact.

(Sources: 1, 2, 3, 13)

- 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?

Discussion:

Less Than Significant Impact: The western parcel of project site, APN 165-220-12, is located within the City's Wildland-Urban Interface zone (WUI). This portion of the project site would include the proposed parking structure. The project includes design features that address potential fire related concerns including access and egress and sprinklers and other fire suppression measures. The proposed project has been reviewed by City Departments, including Public Works and Fire, and no concerns have been raised about exposing people or

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

structures to significant risk or loss, injury or death involving wildland fires. The existing office building is not located with a WUI zone but includes existing fire protection measures. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 2, 3, 4)

IX. HYDROLOGY AND WATER QUALITY

Would the project:

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

Discussion:

Less Than Significant Impact with Mitigation Incorporation: The site consists of two parcels totaling approximately 11.1 acres separated by a public roadway (City of San Rafael, Los Gamos Drive), in addition to 42 parking existing parking spaces located on the adjacent property at 1600 Los Gamos Drive. The 4.09-acre eastern parcel is fully developed with an office building, surface parking lots, and landscaping areas. The 7.02-acre western parcel is partially developed with surface parking lots and associated landscaping. The undeveloped areas of this parcel include hillsides with slopes up to 50 percent which are covered with trees and ground cover. The proposed project proposes to construct an approximately 511-space parking structure on the western parcel and continue to use the surface parking around the existing office building as well as 42 parking spaces at 1600 Los Gamos Drive. The development of these parcels preceded current stormwater treatment requirements. Drainage runoff is collected in area inlets and pipes and directly discharged to the City of San Rafael storm drainage system.

The proposed project includes the construction of a three-story parking structure in an area previously used for surface parking. Minor exterior modifications to the existing office building would not require expanding the existing footprint or significant development activities around the building. Minor circulation and landscape improvements as well as parking stall restriping would be required to update the existing surface parking areas on the parcel surrounding the existing office building. Development activities associated with the proposed project could result in the discharge of pollutants and could impact the quality of receiving waters during construction activities and during the operational phase.

Construction Activities

Development activities would involve demolition, grading, construction, and paving. During these activities, there would be the potential for surface water runoff from construction sites to carry sediment and pollutants into stormwater drainage systems and local waterways.

Grading and the exposure of shallow soils related to grading could result in erosion and sedimentation. The accumulation of sediment could result in the blockage of flows, potentially causing increased localized ponding or flooding. Construction activities would require the use of gasoline and diesel- powered heavy equipment, such as bulldozers, backhoes, water pumps, and air compressors. Chemicals such as gasoline, diesel fuel, lubricating oil, hydraulic oil, lubricating grease, automatic transmission fluid, paints, solvents, glues, and other substances could

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

be used during construction. An accidental release of any of these substances could degrade the quality of the surface water runoff and adversely affect receiving waters. To ensure potential impacts for construction activities do not violate any water quality standards or west discharge requirements, the following mitigation measure is required:

MM HYDRO-1: Prior to grading activities, the project applicant shall prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be prepared by a Qualified SWPPP Developer (QSD). The SWPPP shall include the minimum Best Management Practices (BMPs) required for the identified risk level. The SWPPP shall be designed to address the following objectives:

- (1) All pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled;
- (2) Where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated;
- (3) Site BMPs are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and
- (4) Stabilization BMPs installed to reduce or eliminate pollutants after construction are completed.
- (5) BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual.

The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate, depending on the project risk level, sampling of site effluent and receiving waters. A QSP shall be responsible for implementing the BMPs at the project site. The QSP shall also be responsible for performing all required monitoring, BMP inspection, maintenance and repair activities, and reporting.

Operational Phase

The development of new or replacement impervious surfaces on the project site could result in the discharge of associated pollutants. Runoff from new landscaped areas may contain residual pesticides and nutrients, and occupants of the building and associated foot traffic could increase the amount of trash and debris entering the stormwater drainage system.

*Potentially
Significant
Impact*

*Less-Than-
Significant With
Mitigation
Incorporation*

*Less-Than-
Significant
Impact*

*No
Impact*

MM HYDRO-2:

Prior to a certificate of occupancy, the Project applicant shall verify that operational stormwater quality control measures that comply with the requirements of the current Phase II Small MS4 Permit have been implemented. Responsibilities include, but are not limited to:

- 1) Designing BMPs into Project features and operations to reduce potential impacts to surface water quality and to manage changes in the timing and quantity of runoff associated with operation of the project. These features shall be included in the design-level drainage plan and final development drawings.
- 2) The proposed project shall incorporate site design measures and Low Impact Development design standards, including minimizing disturbed areas and impervious surfaces, infiltration, harvesting, evapotranspiration, and/or bio-treatment of stormwater runoff.
- 3) The Project applicant shall establish an Operation and Maintenance Plan. This plan shall specify a regular inspection schedule of stormwater treatment facilities in accordance with the requirements of the Phase II Small MS4 Permit.
- 4) Funding for long-term maintenance of all BMPs shall be specified.

Implementation of mitigation measures MM HYDRO-1 and 2 would ensure that development activities associated with the proposed project would not result in the discharge of pollutants or impact water quality of standards during construction activities and the ongoing operations of the project site. The potential impacts would be considered less than significant and no further mitigation is required.

(Sources: 1, 3, 4, 7)

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)?

Discussion:

No Impact: The project is located within the Marin Municipal Water District (MMWD) and would utilize domestic water provided by the MMWD. As a result, the proposed project would not substantially deplete groundwater supplies. MMWD has reviewed the project plans and provided their comments in a letter to the City with the finding that there is adequate water supply to service the proposed project given that the site is already served for nearly 150,000 square feet of office and a reuse of the building to medical office would not significantly increase water use. There are no active wells at the site and the proposed project would have no impact upon groundwater recharge given that the site is fully developed.

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

Since the new parking structure will displace the existing surface parking lot, there will be no net increase in the amount of impervious surface area. Similarly, improvements to the off-site roadways and existing surface parking lots around the office building will not increase impervious surface areas. As discussed in Response IX.(a) above, surface run off would be governed by a SWPPP, including minimum BMP standards as required by the RWQCB and City of San Rafael municipal code. Furthermore, construction level designs would be required to meet Marin County Stormwater Pollution Prevention Program (MCSTOPP) standards and regulations for storm water runoff as required by the City of San Rafael. As such, the proposed project would not interfere substantially with ground water recharge. For these reasons, the potential impact is considered less than significant and no mitigation is required.

(Sources: 3, 4, 7, 13)

- 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?

Discussion:

Less Than Significant Impact with Mitigation Incorporation: The proposed project is an urban infill development and would not impact streambeds, nor result in substantial erosion or siltation on or off-site. However, development of the proposed project would include construction activities that would expose soils and could potentially result in substantial erosion. As discussed previously, the State Water Resources Control Board adopted a NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). To obtain coverage under the Construction General Permit, a project applicant must submit various documents, including a Notice of Intent and a SWPPP. Activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground, such as grubbing or excavation.

The purpose of the SWPPP is to identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges and to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges resulting from construction activity. Since the new parking structure will displace an existing surface parking lot, there will be no net increase in the amount of impervious surface area. Similarly, improvements to the off-site roadways and existing surface parking lots around the office building will not significantly increase impervious surface areas. As such, the proposed project would not result in alterations of the existing drainage pattern of the 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.

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

However, to ensure that construction activities do not result in substantial erosion or siltation on- or off- site during construction, implementation of mitigation measure MM HYDRO-1 would reduce potential impacts to less than significant levels. No further mitigation is required.

(Sources: 3, 4, 7, 13)

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?

Discussion:

Less Than Significant Impact: The project site contains existing storm drainage infrastructure serving the surface parking lots and office building roof area. The existing storm drainage infrastructure discharges runoff to connections with the City of San Rafael storm drainage system. This existing infrastructure would be repurposed to serve the new parking structure. The new parking structure will displace an existing surface parking lot in generally the same footprint and, as result, there would be no net increase in the amount of impervious surface area. Similarly, improvements to the off-site roadways and existing surface parking lots around the office building will not increase impervious surface areas. As such, the proposed project would not result in flooding on- or off-site.

It is required by Marin County and the City of San Rafael that the proposed development would not increase the discharged storm drain peak flow and volume. Because the site is currently fully covered with structures and a parking lot, redevelopment of the site with the proposed project would not change the flow and volume of storm drain run-off discharged from the site. Bioretention basins, infiltration planters and underground storage (if required) would be designed to eliminate impacts to water quality and quantity downstream. Construction level plans would be required to satisfy the City of San Rafael Urban Runoff Pollution Prevention Ordinance to ensure that no new net run-off or pollutants from stormwater runoff would result from the proposed project. Furthermore, the project would be required to satisfy BMPs and Low Impact Design (LID) to minimize impacts from construction activities. For these reasons, there would be no impact, and no mitigation would be required.

(Sources: 3, 4, 7, 13)

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

Discussion:

Less Than Significant Impact: See Response IX (d) above. The project site contains existing storm drainage infrastructure consisting of catch basins and underground piping. The existing storm drainage infrastructure

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

discharges runoff to connections with the City of San Rafael storm drainage system. This existing infrastructure would be repurposed to serve the parking structure. Since the new parking structure will displace the existing surface parking lot, there will be no net increase in the amount of impervious surface area. Similarly, improvements to the off-site roadways and existing surface parking lots around the office building will not increase impervious surface areas. As such, the proposed project would not result in increased downstream flow rates that would exceed the capacity of the stormwater drainage systems.

(Sources: 3, 4, 7, 13)

f. Otherwise substantially degrade water quality?

Discussion:

Less Than Significant Impact with Mitigation Incorporation: See discussion in IX (d) above. Development activities associated with the proposed project could result in the discharge of pollutants and could impact the quality of receiving waters during construction activities and during the operational phase. As discussed in Section a) above, the project will obtain coverage under the State’s Construction General Permit and Phase II Small MS4 Permit. Compliance with these required permits would ensure that runoff during construction and operation of the project site does not substantially degrade water quality.

However, to ensure that construction activities do not substantially degrade water quality, implementation of mitigation measure MM HYDRO-1 and MM HYDRO-2 would reduce potential impacts to less than significant levels. No further mitigation is required.

(Sources: 3, 4, 7, 13)

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?

Discussion:

No Impact. As indicated in the San Rafael General Plan Exhibit 29: Flood Hazard Areas, the project site is located outside the area of the 100-year flood, in a zone that is mapped as the area between the limits of the 100-year flood and the 500-year flood on the current FEMA Flood Insurance Rate Map. The proposed project does not contain any housing units. For these reasons, there would be no impact.

(Sources: 1, 3, 4, 7, 14, 15)

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

Discussion:

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

No Impact. See discussion in IX (g) above. The proposed project is not located in or near a 100-year flood hazard area and would not redirect flood flows. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Number 06041C0293E dated March 16, 2016, the site is located within Zone X, Areas of Minimal Flood Hazard. The proposed improvements are outside any area which would potentially impede or redirect 100-year flood flows. Therefore, there would be no impact and no mitigation is required.

(Sources: 3, 4, 7, 14, 15)

- 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?

Discussion:

No Impact. The project site is in North Central San Rafael and is not susceptible to flooding as a result of the failure of a levee or dam as no such structures are located within the vicinity of San Rafael. The nearest dam, Stafford Lake, is approximately 10 miles northwest of the project site. The project site also would not be subject to flooding from the tidal influenced Gallinas Creek, as identified on the Flood Insurance Rate Map. This is a relatively flat site with urban storm drainage facilities in place within adjacent streets. Stormwater run-off and other drainage infrastructure for the site would be upgraded as part of the development plan to manage runoff from a 100-year storm event, as discussed above in IX (d).

(Sources: 1, 3, 4, 7, 14, 15)

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

Discussion:

No Impact. There would be no risk of inundation by seiche, tsunami or mudflow at the project site. Areas of potential tsunami inundation associated with Gallinas Creek are over half a mile away and ten feet lower in elevation than the project site. In addition, there are no lakes, water towers or other water features that pose a rise of seiche near the building. There would be no impact.

(Sources: 1, 3, 14, 15)

X. LAND USE AND PLANNING

Would the project:

- a. Physically divide an established community?

Discussion:

No Impact. The project site is designated in the San Rafael General Plan for office 15-32 units per acre (North San Rafael Commercial Center area) and has a PD zoning classification that allows general office (PD 1590). The General Plan designation allows for office, including general, administrative or medical office, however, since the PD1590 was specific to only allow general office, it requires an amendment for this proposed project. The PD 1590 designation also covers a County of Marin-owned property at 1600 Los Gamos Drive. This County-owned and operated building includes general office uses, as well as the Marin County Office of Emergency Services.

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

However, since the County building also includes a County facility on that site, it is exempt from local zoning control, since it is a superior governmental entity.

The current uses of the project site include similar types of uses to what is envisioned under the proposed project, although they are general office in nature. The project site also includes two surface parking lots: one surrounding the existing building on the east side of Los Gamos, and a second terraced surface lot on the west side of Los Gamos. The proposed project would be consistent with the General Plan land use and Zoning designations, but would require an amendment to the PD to allow for the medical office uses. The proposed project would involve interior remodel of the existing structure and the construction of on and off-site improvements for required parking and circulation upgrades. The proposed improvements are meant to enhance the existing circulation and parking network associated with the existing office building. For these reasons, the proposed project would not physically divide an established community, and therefore, there would be no impact, and no mitigation is required.

(Sources: 1, 2, 3)

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?

Discussion:

Potentially Significant Impact. As discussed above in X (a), the proposed medical office uses in the proposed project would be consistent with the General Plan Land Use Map designation. An amendment is required to the PD zoning designation to permit medical office use, however, amending the PD would still be consistent with overarching GP land use designation. For instance, the proposed project would be generally consistent with other development standards regulating building height, parking, and landscaping. No physical improvements are required to the existing office building, but a new three-story parking structure would be constructed to accommodate the current parking ratios required by the City of San Rafael. The design of the parking structure would be governed pursuant to San Rafael General Plan Community Design Element Policy CD-10: Nonresidential Design Guidelines.

The parking structure would replace an existing surface parking lot and is not higher than 43 feet above existing grade at the front of the structure (top of elevator tower) and a max height of 26 feet to the top of the third parking deck. The rear of the structure would be approximately 10 feet above existing grade and would be screened from above by existing mature vegetation. As designed, the parking structure would not be visible from surrounding residential neighborhoods, and thus compatible with the immediate neighborhood and the community as a whole. However, since a comprehensive analysis of traffic impacts has not yet been undertaken, the scope of potential project impacts and possible infrastructure improvements will be discussed in the EIR.

Furthermore, as discussed above in Section VII. the proposed project has not yet been evaluated for consistency with the policies in the General Plan CCAP, which seek to limit GHG emissions and implement regional air quality goals. This threshold will be discussed in the EIR for the proposed project. The EIR will analyze potential

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

traffic, construction and operational impacts and develop potential temporary and cumulative mitigation measures appropriate to reduce potential GHG impacts to less than significant levels.

Therefore, the proposed project would need to be further evaluated to ensure there is no conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

(Sources: 1, 2, 3, 4, 5, 13)

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

Discussion:

No Impact. The project site is located in the North San Rafael Commercial Center area where there are no adopted habitat conservation plans nor natural community conservation plans for this area. Although the proposed project would include a three story, approximately 511-space parking garage and potential intersection improvements, these site modifications area largely contained within areas of existing disturbance and would not require natural community or habitat disturbance. There would no impact.

(Sources: 1, 3, 4, 5, 10, 11)

XI. MINERAL RESOURCES

Would the project:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Discussion:

No Impact. No known mineral resources would be impacted by the proposed project, which would be located on a previously disturbed site located in the North San Rafael Commercial Center area. There would be no impact.

(Sources: 1, 2, 3, 4)

- 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?

Discussion:

No Impact. The project site is located in the North San Rafael Commercial Center area and is not identified in the General Plan as a mineral resource recovery site. There would be no impact.

(Sources: 1, 2, 3, 4)

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

XII. NOISE

Would the project:

- 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?

Discussion:

Potentially Significant Impact. The project is located at the intersection of Lucas Valley Road and Los Gamos Drive in North San Rafael. Adjacent and surrounding properties include open spaces, residential housing and office uses, including the Mont San Rafael neighborhood to the west and the Marin County Office of Emergency Service at 1600 Los Gamos to the south. The undeveloped Oakview property is located north of Lucas Valley Road, and Highway 101 is located east of the project site. The noise environment of the project site is dominated by the traffic noise from Highway 101 and Lucas Valley Road. Additional technical assessment of the noise environment would be evaluated based on the final Traffic Impact Analysis submitted by the project proponent as part of the proposed project.

In addition to traffic related discussions, the proposed project would be evaluated for noise related impacts based on temporary and operational impacts. Although construction methods have not been determined yet, excavation work will be required and standard construction equipment, such as backhoe, drill rig, grader, cement trucks, dump trucks, and hammering of nails for garage construction are assumed. During construction, noise impacts due to construction activities would be required to meet the noise limits of the San Rafael Noise Ordinance (i.e., to be below 90 dBA property plane limit). The Noise Ordinance limits construction activities, including demolition, alteration, maintenance of construction equipment, and deliveries of materials or equipment to the site. Noise is limited to 90 dBA at any point outside the project site. Construction hours are limited to between 7:00 A.M. and 6:00 P.M. from Monday to Friday, and between 9:00 A.M. and 6:00 P.M on Saturday. The proposed project would be required, as a condition of approval, to comply with the City’s Noise Ordinance at all times.

This Initial Study provides a preliminary analysis to identify the impacts of the project upon noise considerations. Because a comprehensive analysis of traffic, construction and operational activities has not yet been undertaken, the proposed project may potentially result in noise impacts. This threshold will be discussed in the EIR for the proposed project. The EIR will analyze potential mitigation measures, as well as potential temporary and cumulative mitigation measures appropriate to reduce potential noise impacts to less than significant levels.

(Sources: 1, 2, 3, 4, 5)

- b. Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?

Discussion:

Potentially Significant Impact. See discussion in XII(a) above. Construction activities are anticipated to include standard excavation equipment and methods for the development project including for placement of drilled piers that may be necessary to provide structural support to the proposed parking garage during site excavation.

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

Evaluation of the construction activities has not been determined to involve excessive ground borne vibration or ground borne noise levels. This threshold will be discussed in the EIR for the proposed project. The EIR will analyze potential mitigation measures, as well as potential temporary and cumulative mitigation measures appropriate to reduce potential noise impacts to less than significant levels.

(Sources: 1, 2, 3, 4, 5)

- c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Discussion:

Potentially Significant Impact. See discussion in XII (a) above. Long term operations of the proposed project are anticipated to function like typical office and/or medical office buildings uses. Activities and operations would not include uses that would be expected to create substantial permanent increases in ambient noise levels. However, with the change in use to medical office, peak hour vehicular access would be an increase over existing conditions. Similarly, the construction of the parking garage creates an increase of on-site parking over existing conditions

Because a comprehensive evaluation of the long-term operational activities of the proposed project has not yet been undertaken, the proposed project may potentially result in a substantial and permanent increase in ambient noise levels in the project vicinity. This threshold will be discussed in the EIR for the proposed project. The EIR will analyze potential mitigation measures, as well as potential temporary and cumulative mitigation measures appropriate to reduce potential noise impacts to less than significant levels.

(Sources: 1, 2, 3, 4, 5)

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Discussion:

Potentially Significant Impact. See Response XII (a) and (b) above. Discussion of temporary construction noise impacts and ongoing traffic impacts and potential recommended mitigation measures related to the proposed project would be addressed in a EIR.

(Sources: 1, 2, 3, 4, 5)

- 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

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

project area to excessive noise levels?

Discussion:

No Impact. The project is located in the North San Rafael Commercial Center, near the Lucas Valley/Smith Ranch Road intersection east of the Highway 101. There are no public airports near the project site, but the San Rafael airport, a private airport, is located approximately one mile to the east of the project site but it does not have an airport land use plan. Furthermore, the runway and flight patterns for the airport are directed in a northeast/southwest alignment which directs air traffic away from the project site. There would be no impact.

(Sources: 1, 2, 3, 4)

- 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?

Discussion:

Less Than Significant Impact. See Response XII (e) above. The project is located in the North San Rafael Commercial Center and is approximately one mile west of the private San Rafael airstrip. However, the existing office building would be reused to accommodate medical office use and would not include renovations that would expand the current footprint. Furthermore, the project site is located directly adjacent and west of the Highway 101 freeway which dominates the noise setting for the project site. For these reasons, the impact would be considered less than significant and no mitigation is required.

(Sources: 1, 2, 3, 4)

XIII. POPULATION AND HOUSING

Would the project:

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

Discussion:

Less Than Significant Impact. The proposed project includes amending an existing San Rafael PD zoning designation to include medical office uses within the existing office building. A new parking structure and signalized intersection would be required to accommodate the traffic associated with the higher intensity of use, from general office to medical office. On the Kaiser Permanente San Rafael Medical Center campus, at 99 Montecillo Road, over half of the buildings are between 39 to 55 years old. Most of the campus has functioned in its current configuration since 1977. At the same time, medicine has significantly changed over the last fifty years, including the need for larger physical space to accommodate today's advancements in medical technology such as MRIs and CT scanners, which were not part of the original campus design.

As a result, space on the campus is very constrained and the ability to enhance services or renovate clinical areas is limited. To better serve the needs of the Kaiser Permanente members, as well as to make the existing medical

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

center less crowded, Kaiser Permanente Kaiser Permanente would be relocating some non-emergency services and other outpatient services from the main Kaiser Hospital site located in Terra Linda at 99 Montecillo Road, San Rafael to the proposed medical office location at 1650 Los Gamos Drive.

There would be approximately 315 employees working at 1650 Los Gamos Drive at full buildout. Many of these employees, about 77%, or 245, would be relocated from existing Kaiser Permanente facilities in Marin County. Approximately 170 of these relocated Marin employees would be relocated from the Kaiser Permanente Medical Center in Terra Linda. Based on the DTIA, new signalization of the current unsignalized intersection at Los Gamos Drive/Lucas Valley Road would be necessary for improving turning movements and reducing the overall traffic congestion along Lucas Valley Road. This improvement is identified in the General Plan Circulation Element, as a circulation improvement identified for build out of the General Plan, and this project triggers the need for its installation.

The proposed project would continue to serve the existing member base and is not anticipated to facilitate growth along Lucas Valley Road. For these reasons, the new medical office building would not substantially induce population growth in the immediate area or within San Rafael. Therefore, the impact would be less than significant and no mitigation is required.

(Sources: 1, 3, 4, 5, 13)

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Discussion:

No Impact. The proposed project involves amending an existing PD zoning designation to allow medical office uses in an existing approximately 148,000 square foot office building. Proposed infrastructure improvements, including a parking structure and a signalized intersection, would be necessary to lessen potential traffic impacts but would be constructed in areas of previous disturbance. No housing would be impacted by the proposed project. Therefore, there would be no impact, and no mitigation is required.

(Sources: 1, 3, 4, 5)

- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Discussion:

No Impact. See discussion in XIII (b) above. The proposed project includes the reuse of an existing building comprised of general office uses to medical office space. No housing is proposed as part of the proposed project, and development of the project would include utilizing existing developed areas on a site used for office and related parking. Therefore, there would be no impact, and no mitigation is required.

(Sources: 1, 3, 4, 5)

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

XIV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?

Discussion:

No Impact. The proposed project is considered an urban infill development on approximately 11 acres. The existing building is currently service by the San Rafael Fire Department Station #6 located approximately 1.25 miles to the southwest at 670 Del Ganado Road. A Marin County Fire Department, Station #58, is located approximately ¾ of mile west of the site at 777 Miller Creek Road at Lucas Valley Road. The proposed project would not be of a scale to require new or physically altered government facilities, nor would it impact the quality of service, response times or other performance objectives for any of the public services. The San Rafael Fire Department has reviewed the proposed project and did not comment on a need for additional services. For these reasons, there would be no impact.

(Sources: 1, 3, 4, 13)

b. Police protection?

Discussion:

No Impact. The San Rafael Police Department currently provides police protection to the property. The SRPD reviewed the proposed project and did not provide any comments regarding increased calls or additional services. There would be no impact.

(Sources: 1, 3, 4, 13)

c. Schools?

Discussion:

Less Than Significant Impact. The project site is located in the North San Rafael Commercial Center is served by the San Rafael Unified School District for high schools and Dixie School District for elementary and middle schools. The proposed project includes the reuse of general office to medical office use in an existing office building. No new construction would be required to convert the existing building to medial office uses. Mitigation for impacts on schools is governed by Government Code Section 65995(h), which states that the payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code is deemed to be full and complete mitigation of the impacts for the planning, use, development, or the provision of adequate school facilities. Likewise, Section 65996(b) states that the provisions of the Government Code provide full and complete school facilities mitigation. The City collects school impact fees

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

prior to the issuance of building permits. As such, potential impacts are considered less than significant and no mitigation is required.

(Sources: 1, 3, 4)

d. Parks?

Discussion:

Less Than Significant Impact. The proposed project does not include any residential units and would not result in an increase in population or an increased demand for public services such as parks. Existing San Rafael City parks and recreation facilities within close proximity to the project site in the North San Rafael area include Jerry Russom Memorial Park to the west, Oleander, Terra Linda Park, and Munson Park to the south, and the YMCA is located south of the project on Los Gamos Drive. Further to the east, is the McGuinness Park and Golf Club is located along the Bay shoreline to the east of North San Rafael. Within the City of San Rafael corporate limits, there are a total of 25 parks and three community centers.

As discussed in Section XIII(a) above, space on the campus is very constrained and the ability to enhance services or renovate clinical areas is limited. To better serve the needs of the Kaiser Permanente members, as well as to make the existing medical center less crowded, Kaiser Permanente Kaiser Permanente, would be relocating some non-emergency services and other outpatient services from the main Kaiser Hospital site located in Terra Linda at 99 Montecillo Road, San Rafael to the proposed medical office location at 1650 Los Gamos Drive.

There would be approximately 315 employees working at 1650 Los Gamos Drive at full buildout. Many of these employees, about 77%, or 245, would be relocated from existing Kaiser Permanente facilities in Marin County. Approximately 170 of these relocated Marin employees would be relocated from the Kaiser Permanente Medical Center in Terra Linda. The relocation of services and departments would not be replaced at the current hospital location; rather the vacated spaces would be assimilated by the existing hospital staff. Kaiser does not anticipate creating new jobs or increasing the overall staff and/or services at the two locations. New uses at the project site would be consistent with existing uses at the hospital, which is approximately one mile to the southeast. Access and demand for existing parks in this area would not substantially increase over existing use patterns and would not result in substantial adverse physical impacts. For these reasons, the impact would be considered less than significant and no mitigation is required.

(Sources: 1, 3)

e. Other public facilities?

Discussion:

No Impact. Other public facilities near the proposed project include the new SMART rail station at the Marin Civic Center. Most of the employees (77 percent) slated to work at the MOB at 1650 Los Gamos are current employees at the main Terra Linda Hospital or other local Kaiser Permanente medical facilities. New uses at the project site would be consistent with existing uses at the main hospital location which is approximately one mile to the southeast. Access and demand for existing public facilities in this area would not substantially increase over existing use patterns which would not result in substantial adverse physical impacts. For these reasons, the impact would be considered less than significant impact and no mitigation is required.

(Sources: 1, 2, 3, 4)

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

XV. RECREATION

Would the project:

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Discussion:

Less Than Significant Impact. See Response XIV(d) above. As discussed in Section XIII(a) and XIV (d) above, space on the campus is very constrained and the ability to enhance services or renovate clinical areas is limited. To better serve the needs of the Kaiser Permanente members, as well as to make the existing medical center less crowded, Kaiser Permanente Kaiser Permanente, would be relocating some non-emergency services and other outpatient services from the main Kaiser Hospital site located in Terra Linda at 99 Montecillo Road, San Rafael to the proposed medical office location at 1650 Los Gamos Drive.

There would be approximately 315 employees working at 1650 Los Gamos Drive at full buildout. Many of these employees, about 77%, or 245, would be relocated from existing Kaiser Permanente facilities in Marin County. Approximately 170 of these relocated Marin employees would be relocated from the Kaiser Permanente Medical Center in Terra Linda. The relocation of services and departments would not be replaced at the current hospital location; rather the vacated spaces would be assimilated by the existing hospital staff. Kaiser does not anticipate creating new jobs or increasing the overall staff and/or services at the two locations. As the proposed new MOB is generally within the same area as the existing hospital and these offices would mainly be occupied by employees of the current Terra Linda and downtown San Rafael locations, the potential increase in use would not result in substantial physical deterioration of existing neighborhood, regional parks or other recreational facilities. Therefore, the impact of the proposed project upon existing parks and recreation facilities would be less than significant and no mitigation is required.

(Sources: 1, 2, 3, 4)

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

Discussion:

No Impact. The proposed project includes the repurposing of an existing office building for use as medical offices. As discussed in XV(a) above, the project would not create a significant adverse impact upon existing City parks and recreational facilities, nor require construction or expansion of recreational facilities that might have an adverse physical effect on the environment. There would be no impact.

(Sources: 1, 2, 3, 4)

XVI. TRANSPORTATION/TRAFFIC

Would the project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant component of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit)?
- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|

Discussion:

Potentially Significant Impact. The project applicant contracted the services of Fehr & Peers to prepare the DTIA for the proposed project. The DTIA analyzes the transportation impacts associated with the applicant’s proposal to add medical office as an allowed use at the existing 1650 Los Gamos Drive office building. Although not considered an environmental impact, the DTIA also included a parking analysis consistent with the City of San Rafael parking requirements. Fehr & Peers determined that the proposed project is an infill development because it does not require new construction on undeveloped land, as the existing office building will not be expanded and the proposed parking structure will be located on the existing parking lot. The project site is located in the City of San Rafael, just west of the US 101 / Lucas Valley Road interchange.

The following transportation and circulation significance criteria based on the CEQA Guidelines and the *San Rafael General Plan 2020* (City of San Rafael, 2004) are presented below.

The CEQA Guidelines specify that a project would have a significant traffic and circulation impact if it:

- Conflicts with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
- Conflicts with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- Results 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
- Substantially increases hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

1.4.2.1 Signalized Intersections

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

The *San Rafael General Plan 2020* includes traffic LOS standards for signalized intersections and arterials. These criteria and interpretations consistent with the *San Rafael General Plan 2020* Environmental Impact Report (City of San Rafael, 2004), are presented below. The citywide LOS standard from the *San Rafael General Plan 2020* is LOS D

The *San Rafael General Plan 2020* defines the following as significant impacts:

- If a signalized intersection with baseline traffic volumes is operating at an acceptable LOS (LOS A, B, C, or D) and deteriorates to an unacceptable operation with the addition of project traffic.
- If a signalized intersection with baseline traffic volumes is at an unacceptable LOS (LOS E or F) and project traffic causes an increase in the delay of five seconds or more, the *San Rafael General Plan 2020* states that signalized intersections along US 101 and Interstate 580 are exempt from LOS standards because delay at these locations are affected by regional traffic and not significantly impacted by local measures.

1.4.2.2 Unsignalized Intersections

The *San Rafael General Plan 2020* does not provide significance thresholds for unsignalized intersections. Therefore, this analysis utilizes the commonly accepted methodology provided in the Highway Capacity Manual (2010) as documented by the Transportation Research Board. For the purposes of this analysis, a significant impact at an unsignalized intersection would be identified based on the following:

- If an unsignalized intersection with baseline traffic volumes is operating at an acceptable LOS (LOS A, B, C, D, or E) and deteriorates to an unacceptable operation (LOS F) with the addition of Project traffic; or
- If an unsignalized intersection with baseline traffic volumes is already operating at LOS F and Project traffic causes an increase in the delay of five seconds or more.

1.4.2.3 Freeway

The *San Rafael General Plan 2020* and *Transportation Authority of Marin Congestion Management Plan (CMP)* do not provide significance thresholds for freeway segments. Therefore, this analysis utilizes the commonly accepted methodology consistent with other traffic impact studies completed in the surrounding area. For the purposes of this analysis, a significant impact at a freeway segment would be identified based on the following:

- If operations on US 101 deteriorate from LOS E or better under conditions without the project to LOS F during the AM or PM peak hour; or
- If operations on US 101 operating at unacceptable LOS F under conditions without the project by causing the freeway volume over capacity ratio (v/c) to increase by 0.01 or more (i.e. one percent of the freeway segment capacity) during the AM or PM peak hour.

1.4.2.4 Bicycle/Pedestrian

The *San Rafael General Plan 2020* includes the following goals for pedestrian and bicycle conditions:

Goal 16: Bikeways. It is the goal of San Rafael to have safe, convenient and attractive bikeways and amenities.

Goal 17: Pedestrian Paths. It is the goal of San Rafael to have safe, convenient and pleasurable pedestrian amenities.

Consistent with these goals, bicycle/pedestrian impacts would be significant if the project:

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

- Caused a substantial inconvenience or substantial reduction in quality of service for users of existing bicycle or pedestrian travel
- Substantially reduced bicycle or pedestrian access
- Substantially reduced safety for bicyclists or pedestrians

1.4.2.5 Transit

The *San Rafael General Plan 2020* includes the following goals related to the transit network:

C-14 Transit Network. Encourage the continued development of a safe, efficient, and reliable regional and local transit network to provide convenient alternatives to driving. Consistent with this goal, transit impacts would be significant if the project:

- Induced substantial growth or concentration of population beyond the capacity of existing or planned public transit facilities.
- Increased demand for public transit service to such a degree that accepted service standards are not maintained.
- Reduced availability of public transit to users, or interfered with existing transit users.

1.4.2.6 Parking

While parking is not considered a parking an environmental impact, a parking analysis was completed for information purposes. The *San Rafael General Plan 2020* includes the following goal related to vehicle parking:

General Plan Goal 18: Adequate Parking. It is the goal of San Rafael to provide parking that is adequate and accessible, with attention to good design.

The DTIA study analyzes expected transportation conditions with the proposed project condition in place under Existing, Baseline, and Cumulative conditions. Fehr & Peers determined that the proposed project would result in transportation impacts at several intersections. As such, the DTIA includes potential mitigation measures to reduce the proposed project’s impacts to less than significant with mitigation incorporated, where feasible. Potential mitigation measures include improving the Lucas Valley Road/Los Gamos Drive intersection, consistent with the improvements identified in the San Rafael General Plan 2020, and a Transportation Demand Management (TDM) program to reduce peak hour employee single-occupant vehicle trips.

This Initial Study provides a preliminary analysis to identify the impacts of the project upon traffic and transportation considerations. Because a comprehensive analysis of traffic and parking has not yet been completed, the proposed project may potentially result in significant traffic and transportation impacts. Based upon this potential for significant impacts, preparation of an EIR is required to further evaluate the project. As such, the preliminary evaluation of the DTIA recognizes that a full analysis, complete with revisions and updated data and discussions, will be prepared as a Final TIA and will be included as part of the EIR process. Although, the DTIA may be referenced in the EIR, the Final TIA would be the source document for the final analysis. Therefore, the EIR will analyze potential mitigation measures, as well as potential temporary and cumulative mitigation measures appropriate to reduce potential traffic and transportation impacts to less than significant levels.

(Sources: 1, 3, 4, 5, 12)

- b. Conflict with an applicable congestion management program, including, but not

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Discussion:

Potentially Significant Impact. See Response XVI (a) above. Intersection and freeway results will be summarized in the EIR by Level of Service (LOS). LOS is a qualitative description of operations ranging from LOS A, when the roadway facility has excess capacity and vehicles experience little or no delay, to LOS F, where the volume of vehicles exceeds the capacity, resulting in long queues and excessive delays. Typically, LOS E represents “at-capacity” conditions and LOS F represents “over-capacity” conditions. Intersection and freeway LOS were established based on traffic analysis of the study intersections, conducted using a method documented by the Transportation Research Board (TRB) in the 2010 Highway Capacity Manual (HCM).

The DTIA utilized traffic analysis software Synchro/SimTraffic 9.0 and was based on the City of San Rafael’s existing traffic model. For purposes of modeling the entire network as a “system”, micro-simulation (SimTraffic) was used. The primary difference between SimTraffic and HCM is that the HCM analyzes intersections in isolation and does not include the effects of upstream or downstream intersections, which directly affect traffic flow. SimTraffic provides measures of effectiveness that are consistent with the HCM such as movement delay and weighted average delay. For signalized intersections, the LOS is based on the average delay experienced by all vehicles passing through the intersection.

At unsignalized intersections, operations are defined by the average control delay per vehicle (measured in seconds) for each stop-controlled movement. This incorporates delay associated with deceleration, acceleration, stopping, and moving up in the queue. For side-street stop-controlled intersections, LOS is not defined for the intersection as a whole. Instead, the average delay and associated LOS reported in this study is for the worst-case controlled approach. For all-way stop-controlled intersections, the LOS is represented by the average control delay for the whole intersection.

Similar to intersection, the operating characteristics of freeway basic, merge, and diverge segments are evaluated using the concept of LOS. Freeway section LOS is based on vehicle density (passenger cars per lane per mile). Subsequent EIR analyses will consider freeway ramp density using the methods described in Chapter 13 of the HCM. The inputs to calculate freeway segment densities would be obtained through Caltrans data and field observations.

The purpose of the freeway analysis is to determine the proposed project’s contribution to the available capacity on the freeway; therefore, the Highway Capacity Software (HCS) was used to complete the analysis. HCS was used because it applies the freeway methodologies in the HCM by accounting for the volume demand and available capacity by segment. The HCS tool is a static model which does not account for downstream queues. However, since the purpose of the analysis is to determine the proposed project’s contribution to the regional network, and not to determine or mitigate existing bottlenecks or queues, the static model approach was the most appropriate to account for the proposed project’s contribution. To supplement for existing queues as a result of downstream bottlenecks, field observations were completed and included in analysis findings.

The VMT analysis forecasted the propose project employee VMT and compared them to future projected VMT based on the regional transportation and land use model provided by the Metropolitan Transportation Commission

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

(MTC) and the Association of Bay Area Governments (ABAG). The proposed project will move employees from existing compressed Kaiser facilities in Marin County, to the building at 1650 Los Gamos Drive. As such, the proposed project is not expected to generate significant additional regional trips, rather, redistribute them to a new location within the region. The VMT analysis is based on the California Environmental Quality Act (CEQA) Guidelines on VMT developed by the Governor’s Office of Planning and Research per SB 743 (Steinberg, 2013). SB 743 mandates a change in the way that public agencies evaluate the transportation impacts of projects under CEQA, away from LOS. The proposed changes to the CEQA Guidelines are not yet adopted; when they are, VMT will be the new metric for transportation analysis.

The San Rafael General Plan 2020 proposes circulation or capital improvements deemed necessary to maintain acceptable LOS standards and to improve the San Rafael circulation system, which are typically funded through traffic mitigation fees. As noted above in XVI (a), the proposed project would result in a net increase of 161 net new trips during the a.m. peak hour and 312 net new trips during the p.m. peak hour for a total of 473 peak hour trips. As provided in General Plan 2020 Policy C-5 B, the City Traffic Engineer makes the determination whether to apply LOS analysis for any development project. Presently, the Level of Service for intersections in the project vicinity along Lucas Valley and Los Gamos are at or very close to LOS D. The project’s peak hour trips would cause additional delays of up to 50 seconds at these impacted intersections.

The City Traffic Engineer has reviewed the project plans and the DTIA and recommends a condition of project approval be required that the applicant pay traffic mitigation fee in the amount of \$2,000,825 based on 473 net new peak hour trips x traffic mitigation fee (\$4,246) prior to issuance of a Building Permit. This traffic impact fee would be credited to the applicant against proposed improvement or potential requirements for infrastructure upgrades, including the construction of a signalized intersection at Los Gamos and Lucas Valley Road. In addition, San Rafael DPW has an established construction vehicle impact fee that is required at the time of building permit issuance; which would be calculated at 1% of the total project valuation, with the first \$10,000 of valuation exempt.

As the DTIA will be further evaluated by the City of San Rafael, potential conflicts with applicable congestion management programs, including, but not limited to level of service standards and travel demand measures have not yet been identified and could remain significant and unavoidable. Based upon this initial review, preparation of an EIR is required. The EIR will provide analysis of potential traffic impacts and potential cumulative impacts and mitigation measures necessary to reduce potential impacts to less than significant levels. The EIR would also address project alternatives to analyze this potentially significant adverse impact.

(Sources: 1, 2, 4, 5, 13)

- 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?

Discussion:

No Impact. The proposed project would have no impact on the location or frequency of air traffic patterns at local private or regional-serving public airports due to its location. Although there is a private airport approximately one mile to the east of the subject property, the proposed project would be a continuation of office related uses and is consistent with the General Plan for development in this area. The existing building is not located within the flight path of the airport and the conversion of medical office would not result in a change of air traffic patterns.

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

(Sources: 1, 3, 4, 5)

- d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Discussion:

Potentially Significant Impact. The proposed project is an urban infill development within the North San Rafael Commercial Center and would be consistent with General Plan in terms of land use and intensity. The proposed project includes modification of existing site access, eliminating the primary driveway off Los Gamos to the existing surface parking lot and relocating it farther south for access to the new parking structure. The project traffic study was evaluated by the City of San Rafael Department of Public Works for traffic and circulation compliance with City standards, including potential conflicts to site distances, and found them to be acceptable. However, the full analysis of proposed project improvements, including proposed signalized intersection at Los Gamos and Lucas Valley Road have not yet been evaluated.

This Initial Study provides a preliminary analysis to identify the impacts of the project upon traffic and transportation considerations. Because a comprehensive analysis of traffic and transportation considerations has not yet been undertaken, the proposed project may potentially result in such impacts. This threshold will be discussed in the EIR for the proposed project. The EIR will analyze potential mitigation measures, as well as potential temporary and cumulative mitigation measures appropriate to reduce potential traffic and transportation impacts to less than significant levels.

(Sources: 1, 3, 4, 5, 13)

- e. Result in inadequate emergency access?

Discussion:

Less Than Significant Impact. The proposed project includes the reuse of an existing office building to accommodate medical office uses. Access, parking and circulation patterns would remain largely unchanged for the building. Across Los Gamos Drive, a parking structure would be constructed in an area previously used for surface parking. The proposed ingress and egress, including required fire access and fire lanes surrounding the parking structure, have been reviewed by City departments, including the San Rafael Fire Department. It has been determined that the proposed project would have adequate emergency access. There would be no impact.

(Sources: 1, 3, 4, 5, 13)

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

Discussion:

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

Potentially Significant Impact. Based on the DTIA, it is anticipated that the proposed project would include construction of a signalized intersection at Los Gamos Drive and Lucas Valley Road, as well as a new three-story parking structure west of the existing office building adjacent to Los Gamos Drive. Per the City’s adopted Bicycle/Pedestrian Master Plan, which guides the City in the construction, upgrading and maintenance of the citywide bicycle and pedestrian infrastructure system, there is a Class III bike lane along Los Gamos Drive connecting Lucas Valley Road to Freitas Parkway to the south. Public transit is provided to the project area by Golden Gate Transit (GGT); the nearest GGT stop is located adjacent to Highway 101 just east of the project site. The project would be consistent with the City’s General Plan policies that encourage urban infill development close to public transit services. The project site is located approximately 3.5 miles north of the San Rafael Transit Center and approximately 1.3 miles north of the new SMART rail station at the Marin Civic Center.

However, the full analysis of proposed project improvements, including a proposed signalized intersection at Los Gamos and Lucas Valley Road and the construction of the parking structure, have not been fully evaluated with regards to bicycle and pedestrian facilities or public access plans, programs, and/or policies.

This Initial Study provides a preliminary analysis to identify the impacts of the project upon traffic and transportation considerations. Because a comprehensive analysis of traffic and transportation considerations has not yet been undertaken, the proposed project may potentially result in such impacts. This threshold will be discussed in the EIR for the proposed project. The EIR will analyze potential mitigation measures, as well as potential temporary and cumulative mitigation measures appropriate to reduce potential traffic and transportation impacts to less than significant levels.

(Sources: 1, 2, 3, 4, 5, 13)

XVII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is Geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	-------------------------------------	--------------------------	--------------------------

Discussion:

Less Than Significant Impact with Mitigation Incorporation. See Responses V (a), (b) and (c) above. The proposed project analyzed by GANDA included a cultural resources investigation. The report includes an archival and record search of the 24-acre subject parcel and a surrounding 0.25-mile radius, contact with the Native American Heritage Commission (“NAHC”) and potential Native American stakeholders, and a field inventory of the subject parcel that included an architectural review of standing buildings and structures that lie within the proposed development area. The existing office building is less than 45 years old and was built in 1979.

Pursuant to AB 52, the scope of the evaluation at the project level should include consultation with Native American representatives identified by the NAHC for areas outside of reservations, and with Tribal representatives of federally recognized Tribes where projects are located near or within lands associated with federally recognized Tribes. The consultation should be undertaken and be consistent with most recent guidance provided by the Office of Planning and Research. The purpose of the consultation is to identify Tribal cultural resources and ensure that such resources are taken into consideration in the planning process.

On March 17, 2016, a records search was conducted at the NWIC/CHRIS at Sonoma State University in Rohnert Park, California by GANDA Archaeologist Robin Fies, M.A. (File No. 15-1354). The NWIC is a repository of all cultural resources site records, previously conducted cultural resources investigations, and historic information concerning cultural resources for 18 counties, including Marin County. The purpose of this records search was to compile information pertaining to the locations of previously recorded cultural resources and prior cultural resources studies within a 0.5-mile radius of the ADI that inform the cultural resources sensitivity of the Project.

The following sources were consulted during the records search:

- NWIC base map: USGS 7.5-minute series topographic quadrangles of Novato, California (1980);
- Survey reports from previous cultural resources investigations and cultural resources site records to identify recorded archaeological sites and built environmental resources (i.e, buildings, structures, and objects) located within a 0.5-mile radius of the ADI; and
- California Office of Historic Preservation (OHP) sources, including the California Inventory of Historic Resources (1976), California Archaeological Determinations of Eligibility (2012a), and the Historic Properties Directory (2012b), which combines cultural resources listed as California Points of Historical Interest and California Historical Landmarks and those that are listed in or determined eligible for listing in the NRHP or the CRHR.

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

The records search results indicate that two cultural resources investigations have been completed within or directly adjacent to the ADI: Chavez 1979 and Darko 2014. Additionally, the records search indicated that eight cultural resources investigations have been completed within a 0.25-mile radius of the ADI: Hastings 1975; Melandry 1981; Chavez 1985; Flynn 1989; Woodward-Clyde Consultants 1991; Holman 1976; and Roop 1992a and 1992b.

No cultural resources were identified within the project site or within a 0.25-mile radius of the project site; however, three documented prehistoric archaeological sites (CA-MRN-138, 139, and 145) along Miller Creek are within a 0.5-mile radius of the project site. The three prehistoric archaeological sites are listed below:

P-21-000163/CA-MRN-138: This prehistoric shellmound site is located approximately 0.42 mile north of the ADI along the south bank of Miller Creek. Several artifacts have been identified in association with the site including chert debitage and a small cobble pestle. This site was likely heavily impacted as a result of historic and modern development (Riddell 1955a). This site has not been formally evaluated for listing in the CRHR or the NRHP.

P-21-000164/CA-MRN-139: This prehistoric shellmound site is located approximately 0.49-mile northwest of the ADI along the south bank of Miller Creek. Human burials have been identified in association with the site in addition to chert debitage. This site was historically looted and was likely heavily impacted through historic and modern development (Riddell 1955a). This site has not been formally evaluated for listing in the CRHR or the NRHP.

P-21-000170/CA-MRN-145: This prehistoric shellmound site is located approximately 0.50 mile northwest of the ADI along the north bank of Miller Creek (Nelson 1907). This site was likely destroyed through historic and modern development and has not been formally evaluated for listing in the CRHR or the NRHP.

Based on the results of the cultural resources investigation conducted for this proposed project, no tribal cultural resources were identified within the project area. The NAHC was contacted by letter on March 16, 2016. A search of the Sacred Lands File housed at the NAHC did not indicate the presence of any Native American cultural resources in the vicinity of the Project. In the response dated April 5, 2016, the NAHC also provided a list of individuals to contact from the FIGR) for further information regarding local knowledge of sacred lands. Letters and associated maps were sent to individuals listed by the NAHC (Greg Sarris and Gene Buvelot) on April 27, 2017 as well as Buffy McQuillen, FIGR's Tribal Heritage Preservation Officer (THPO). The THPO contacted GANDA on May 18, 2017 to schedule a formal consultation but no meeting has been confirmed as of the publication of this document.

Although construction of the proposed project would have no impact on known tribal cultural resources, there is a possibility that previously unidentified resources and subsurface deposits are present within the project area. If present, excavation, grading, and movement of heavy construction vehicles and equipment could expose, disturb or damage any such previously unrecorded tribal cultural resources. Because the possibility of encountering archaeological resources during construction cannot be completely discounted, the impact related to the potential disturbance or damage of previously undiscovered archaeological resources, if present, could be significant.

However, as the proposed project could have the potential to encounter unknown tribal cultural resources during ground-disturbance activities, implementation of the following mitigation measures is required:

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

MM TRIBAL-1: Implementation of the unanticipated discovery measures outlined in Section V(b) and (d) above, address the potential discovery of previously unknown resources within the project area. If significant tribal cultural resources are identified onsite, all work would stop immediately within 50 feet of the resource(s) and the project applicant would comply with all relevant State and City policies and procedures prescribed under PRC Section 21074.

Therefore, implementation of the above mitigation measure as well as implementation of mitigation measures MM CULT-1 and MM CULT-2 will reduce the potential impact to less than significant levels and no further mitigation is required.

(Sources: 1, 3, 4, 9, 21, 22)

XVIII. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Discussion:

Less Than Significant Impact. The project site is within the North San Rafael Commercial Center which is served by the Las Gallinas Valley Sanitation District (LGVSD), which provides sanitary sewer service to the north San Rafael area. Wastewater is transmitted to the LGVSD treatment facility, located at 300 Smith Ranch Road in San Rafael. The proposed medical office use would result in similar intensity of development at the project site and would continue an existing use and service. Although the current occupancy of the existing building is well below 50 percent, the proposed project anticipates occupancy rates consistent with historical averages for the building. The LGVSD has reviewed the project, provided comments and will require that the development project submit an Application for Allocation of Capacity and pay additional capacity fees prior to submittal of a building permit. The proposed project would not conflict with the existing capacity of wastewater delivery to LGVSD or the ability of the waste water treatment facility to treat the additional wastewater generated by the project. For these reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 1, 3, 4, 13)

- 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?

Discussion:

Less Than Significant Impact. See discussion in XVIII(a), above. Local water service is currently provided by Marin Municipal Water District (MMWD) to the project site for the existing office building. In its comment letter, MMWD stated that providing water service to the new medical office building would not impair the District's ability to continue service to the property. However, MMWD has determined that the property's current annual water entitlement may be insufficient for the new uses (including the new parking structure) and the purchase of

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

additional water entitlement may be required, as well as compliance with all indoor and outdoor requirements of District Code Title 13 for water conservation.

The construction of the proposed parking structure would require realignment and reconstruction of a portion of a 6-inch sanitary sewer pipe currently running under the middle of the surface parking lot. The proposed realignment would direct sanitary sewer to the north of the proposed parking structure and then east to a connection within Los Gamos Drive. The routing of the proposed sanitary sewer line would be located within the limits of disturbance propose for the parking structure and would not require increase or excessive grading or excavation to realign the pipe. The LGVSD has reviewed the proposed project and would require project design plans for the proposed realignment including preparation of a quitclaim deed and new sewer easement for recordation by the LGVSD. For the reasons, the impact is considered less than significant and no mitigation is required.

(Sources: 4, 13, 16)

- 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?

Discussion:

Less Than Significant Impact. Proposed storm drainage design for the proposed project including assessment of impacts upon existing facilities in the vicinity of the project site have been evaluated in a Preliminary Drainage Analysis prepared by BKF Engineers. As discussed in Section IX, Hydrology and Water Quality, the construction of new stormwater drainage facilities or expansion of existing facilities would not be required for the proposed project, because the Project would not increase the amount of surface water runoff leaving the site. The project will incorporate the use of bio-filtration areas onsite to limit the amount of surface water runoff from the site. The application of this best management practice, as well as the application of the City’s standard conditions of project approval, would result in an improved condition in comparison to the existing site conditions.

The San Rafael DPW has reviewed the proposed project plans and indicated that detailed project plans will be required to accurately define square footage of existing impervious areas, as well as proposed creation or replacement areas. In addition, San Rafael DPW will require that the proposed project detailed plans be compliant with requirements for the MCSTOPPP for improved water quality and reduction of runoff impacts compared to existing conditions. No new offsite storm drainage facilities or expansion of existing facilities would be required as a result of project construction. Therefore, the impact would be considered less than significant and no mitigation is required.

(Sources: 3, 4, 7, 16, 20)

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

Discussion:

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

Less Than Significant Impact. See discussion in XVIII (b) above. The MMWD prepared an Urban Water Management Plan (UWMP) in 2010 and an update in 2015. Based upon the MMWD 2015 UWMP update, adequate water supply is available for the proposed project. Based upon water demand projections, the UWMP forecasts that the MMWD would serve an additional 49 acre-feet per year of water for commercial uses by the year 2020. This is to serve a projected 251 additional commercial accounts by the year 2020. The District’s water conservation measures are expected to result in a drop of per capita water demand resulting in an overall decrease in water use for commercial uses despite an increasing number of projected accounts by the year 2020. The proposed 150,000 square feet of medical office use is within the project amounts of the UWMP.

The State of California has recently endured a period of extended drought that spanned water years 2012 through 2016, which included the driest four-year statewide precipitation on record (2012-2015) and the smallest Sierra-Cascades snowpack on record (2015, with 5 percent of average). It was marked by extraordinary heat: 2014, 2015 and 2016 were California’s first, second and third warmest year in terms of statewide average temperatures.

The State responded to the emergency with actions and investments that also advanced the California Water Action Plan, the Administration’s five-year blueprint for more reliable, resilient water systems to prepare for climate change and population growth. To advance the priorities of the Water Action Plan and respond to drought, the voters passed a comprehensive water bond, the Legislature appropriated and accelerated funding and state agencies accelerated grants and loans to water projects.

California also enacted the historic Sustainable Groundwater Management Act, took action to improve measurement and management of water, retrofitted tens of thousands of inefficient toilets, replaced lawns with water-wise landscaping and provided safe drinking water to impacted communities.

However, on April 7, 2017, Governor Edmund G. Brown ended the drought state of emergency due to unprecedented water conservation and plentiful winter rain and snow. Executive Order B-40-17 lifts the drought emergency in all California counties except Fresno, Kings, Tulare and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. The order also rescinds two emergency proclamations from January and April 2014 and four drought-related executive orders issued in 2014 and 2015.

Executive Order B-40-17 builds on actions taken in Executive Order B-37-16, which remains in effect, to continue making water conservation a way of life in California:

- The State Water Resources Control Board will maintain urban water use reporting requirements and prohibitions on wasteful practices such as watering during or after rainfall, hosing off sidewalks and irrigating ornamental turf on public street medians.
- The State will continue its work to coordinate a statewide response on the unprecedented bark beetle outbreak in drought-stressed forests that has killed millions of trees across California.

Therefore, potential impacts to water supply are considered less than significant and no new or expanded entitlements are needed.

(Sources: 3, 4, 13, 16, 17)

e. Result in a determination by the wastewater treatment provider, which serves or may

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Discussion:

Less Than Significant Impact. See discussion in XVII (a) and (b), above. The LGVSD would provide wastewater services to the proposed project and has adequate facilities to accommodate the proposed use at the project site. Waste water generation and impacts on the LGVSD have been addressed in the in the San Rafael General Plan. The continuation of existing service to the project site would not result in impacts to the LGVSD facility at Smith Ranch Road. The LGVSD has reviewed the project and provided comments, indicating that the proposed project is required to submit an application for Allocation of Capacity as well as fees for sewer unit and plumbing fixtures as required. Thus, no additional impacts to wastewater treatment capacity would result from the proposed project and impacts would be considered less than significant.

(Sources: 1, 3, 4, 13, 16)

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

Discussion:

Less Than Significant Impact. Solid waste collected within the City of San Rafael is disposed of at the Redwood Landfill. The Redwood Landfill is a fully permitted Class III disposal site located approximately five miles north of the project site (3.5 miles north of the City of Novato), and is used for more than 95 percent of Marin County's solid waste disposal, including solid waste from the City of San Rafael. The Redwood Landfill site consists of 420 acres of which 222.5 acres are dedicated to waste disposal and the balance supports Composting, Recycling, and Operations facilities as well as open space and a fresh water lagoon. The Redwood Landfill has a permitted capacity of 19,100,000 cubic yards. Nearly one-half of the materials brought to the site are reused or recycled, contributing to one-third of the recycling that occurs in Marin County. Redwood Landfill is permitted to accept 2,310 tons of material daily. The conversion of existing office space to medical office uses would not significantly change the amount of solid waste generated within the City because the development would not significantly change the number of people working and living within the City as planned in the City's General Plan population counts and would not significantly alter the amount of waste generated within the City. As the project would be consistent with the existing General Plan, potential impacts are considered less than significant

(Sources: 1, 4, 19)

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

Discussion:

Less Than Significant Impact. See discussion in XVII (f), above. Solid waste disposal services for the project site would be handled by Marin Sanitary Service and the Redwood Landfill. Both entities are subject to the California Integrated Waste Management Act to meet state waste diversion goals. Both entities offer recycling services to minimize the solid waste that is deposited it the landfill. Marin Sanitary Service offers curbside recycling and green waste composting. The Redwood Landfill recycles approximately 50 percent of the

<i>Potentially Significant Impact</i>	<i>Less-Than- Significant With Mitigation Incorporation</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>
---	---	--	----------------------

materials brought to the landfill site. The proposed project would be served by these entities and the existing recycling and waste reduction programs which comply with the California Integrated Waste Management Act.

The Marin Hazardous and Solid Waste Joint Powers Authority (JPA) provides hazardous waste collection, recycling, and disposal information to ensure compliance with state recycling mandates. The Marin County Department of Public Works/Waste Management administers the JPA. The JPA comprises the cities and towns of Belvedere, Corte Madera, Fairfax, Larkspur, Mill Valley, Novato, Ross, San Anselmo, San Rafael, Sausalito, and Tiburon, and the County of Marin. The JPA's purpose is to ensure Marin's compliance with the California Integrated Waste Management Act and its waste reduction mandates. The project would comply with the JPA through the recycling and waste reduction services provided by Marin Sanitary Service and the Redwood Landfill. Therefore, potential impacts are considered less than significant.

(Sources: 1, 4, 19)

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

- 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?

Discussion:

Less Than Significant Impact with Mitigation Incorporation. The proposed project, with implementation of the proposed mitigation measures, would not 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. As discussed above, the proposed project would be located on areas of existing disturbance or development. Where potential impacts to wildlife or plant communities would occur, proposed mitigation measures in Section V. Biology would ensure that they would be reduce to less than significant levels. For these reasons, the impact would be considered less than significant after mitigation incorporation and no further mitigation would be required.

(Sources: 1-21)

- 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

Potentially
Significant
Impact

Less-Than-
Significant With
Mitigation
Incorporation

Less-Than-
Significant
Impact

No
Impact

connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Discussion:

Potentially Significant Impact. The project applicant has submitted a Draft Traffic Impact Analysis (DTIA) of the proposed project that will be evaluated pursuant to CEQA and the City of San Rafael standards and regulations. This Initial Study provides a preliminary analysis to identify the impacts of the project upon Air Quality, Greenhouse Gas Emissions, Noise, and Traffic and Transportation considerations. Based upon this initial review, preparation of an Environmental Impact Report (EIR) is required to understand the full evaluation of these potential environmental impacts. The EIR will provide analysis of the potential traffic, construction, and operational impacts and as a result would provide mitigation measures necessary to reduce potential cumulative impacts to less than significant levels. The EIR would also address project alternatives to analyze potentially significant cumulatively considerable adverse impacts.

(Sources: 1-21)

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

Discussion:

Potentially Significant Impact. See discussion above in XVIII (b), where potentially significant impacts on human beings from noise and traffic and transportation are identified and recommended mitigation measures to reduce these impacts to a less than significant level are identified.

(Sources: 1-21)

SOURCE REFERENCES

The following is a list of references used in the preparation of this document. Unless attached herein, copies of all reference reports, memorandums and letters are on file with the City of San Rafael Department of Community Development. References to Publications prepared by Federal or State agencies may be found with the agency responsible for providing such information.

1. City of San Rafael General Plan 2020, adopted November 2004; as amended through July 2016.
2. City of San Rafael General Zoning Ordinance, adopted September 1992; as amended May 1996.
3. Marin County GIS; Marin Map; www.marinmap.org, accessed May 2017
4. Application Packet submitted by Kaiser Permanente, including site plan, architectural plans, landscape plans, civil plans, and additional materials and exhibits.
5. Focused Traffic Impact Analysis for Medical Office Building, Fehr & Peers, November 29, 2016.
6. Geotechnical Engineering and Geologic Hazards Study, GEOSPHERE Consultants, INC., October 19, 2016
7. Hydrology and Water Quality, Los Gamos Medical Office Building CEQA Review, BKF Engineers, February 10, 2017
8. Updated Phase I Environmental Site Assessment 1650 Los Gamos Drive and Adjacent West Parcel, San Rafael, California 94903, STANTEC, February 22, 2016
9. Archaeological Resources Report for the Kaiser Permanente 1650 Los Gamos Medical Office Project, San Rafael, Marin County, Ca; Garcia and Associates, May 2, 2017
10. Kaiser Permanente 1650 Los Gamos Drive Project, San Rafael, California – Biological Resources CEQA Review, Garcia and Associates, May 17, 2017
11. Arborist Plan Review, Urban Forestry Associates, March 17, 2017.
12. City of San Rafael Greenhouse Gas Reduction Strategy Compliance Checklist
13. Inter-departmental and Agency Memoranda: 1) Public Works Department, May 14, 2017; 2) Fire Prevention, March 15, 2017; Police Department, March 15, 2017; Las Galinas Valley Sanitation District, March 14, 2017; Marin Municipal Water District; comment letter, Christopher Borjian, May 23, 2017
14. Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM). Community Panel No. 06041C0293E, effective March 16, 2016
15. Association of Bay Area Governments, Alquist-Priolo Earthquake Fault Zoning and Hazard Maps
16. MMWD 2010 Urban Water Management Plan
17. California Drought Portal, www.drought.ca.gov, accessed May 2017

18. BAAQMD website: <http://www.baaqmd.gov/>
19. Redwood Landfill website: <http://www.redwoodlandfill.wm.com/>
20. MCSTOPP: <http://www.marincounty.org/depts/pw/divisions/mcstoppp>
21. City of San Rafael Archaeology Sensitivity Map, adopted October 2001.
22. PastFinder Archaeological Database, Archaeological Sensitivity Report, generated May 1, 2017

DETERMINATION FOR PROJECT

On the basis of this Initial Study and Environmental Checklist I find that the proposed project could have a Potentially Significant Effect on the environment and an ENVIRONMENTAL IMPACT REPORT will be required.

Signature

Date

Printed Name

Title

REPORT AUTHORS AND CONSULTANTS

Sean Kennings, LAK Associates Contract Planner

Planning & Preservation for the
City of San Rafael, Community Development Department.