

**ADDENDUM (No. 3)  
TO SAN RAFAEL GENERAL PLAN 2020  
ENVIRONMENTAL IMPACT REPORT  
(SCH#2003052031)**

**FOR AMENDMENT TO  
San Rafael General Plan 2020 Proposing:  
Housing Element Update (2015-2023)**

Lead Agency:

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## A. INTRODUCTION

The City of San Rafael is updating the City's Housing Element pursuant to Government 65580-65589. The Housing Element, which is one of many elements of the San Rafael General Plan 2020 (General Plan) serves as a guiding policy document that establishes policies and programs necessary to accommodate projected housing needs as determined by the Association of Bay Area Governments (ABAG). The housing needs are expressed in the Regional Housing Needs Assessment (RHNA) for a given planning period, this period being the 2015-2023. Key strategies identified as methods to accommodating housing needs include the preservation and strengthening of existing neighborhoods, a proactive approach to new housing and fostering of land use patterns and densities which will reduce reliance on carbon-based transportation (also see project description below).

Updates and changes proposed to the San Rafael Housing Element are limited to deletion of completed programs, consolidation of similar or related programs, minor amendments to other programs and/or revised timelines. Pursuant to Section 15164 of the CEQA Guidelines, an Environmental Impact Report (EIR) Addendum is considered the appropriate document when "only minor technical changes or additions are necessary" and which would not insight or otherwise contribute to significant environmental effects. An Addendum is the most appropriate document pursuant to CEQA Guidelines because the Housing Element Update does not introduce any new impacts or more severe impacts relative to what was previously analyzed and none of the conditions described in Section 15162 have occurred.

This Addendum has been prepared in accordance with Section 15164 of the CEQA Guidelines and analyzes the potential impacts of the San Rafael Housing Element Update relative to those impacts previously identified in the San Rafael General Plan 2020 Environmental Impact Report (EIR) (SCH# 203052031), which was certified on November 15, 2004 through City Council Resolution No. 11664. While the Housing Element Update does include minor changes such as those outlined below, it is consistent with what was identified in the EIR and would not result in any new significant environmental impacts or substantially increase the severity of previously identified significant impacts from those previously identified in the certified General Plan EIR.

The Housing Element Update has been reviewed against the impacts and mitigation measures presented in the certified General Plan EIR. As set forth below, this Addendum finds that there would be no change to the impacts evaluated for housing, population and growth, circulation/transportation, air quality, noise, biological resources, or other environmental categories.

## B. BACKGROUND

On November 15, 2004, the City Council of the City of San Rafael adopted the San Rafael General Plan 2020 (General Plan). The General Plan has subsequently been amended with an update to the Housing Element (2011), the introduction of a Sustainability Element (2011), changes to various policies, and the redesignation of several land uses (2004-2014).

The City of San Rafael prepared an Environmental Impact Report (EIR) to assess the physical environmental impacts of the General Plan, its policies and implementing programs (SCH #2003052031) in accordance with the California Environmental Quality Act (CEQA) Guidelines. The Final EIR (FEIR) was certified by the City Council on November 15, 2004 (City Council Resolution No. 11664.). The certified EIR consists of the following volumes:

- San Rafael General Plan 2020 Background Report; April 12, 2001/reprinted December 19, 2003;
- San Rafael General Plan 2020 Draft Environmental Impact Report (DEIR); February 2004; and
- San Rafael General Plan 2020 FEIR/Response to Comments to the Draft Environmental Impact Report; August 2004

The certified EIR (including the DEIR, FEIR and subsequent amendments) assesses environmental impacts of the General Plan development projections through 2020 (cumulative). These impacts include, among others, transportation, air quality and noise. The certified EIR serves as a program-level environmental document for subsequent City actions that are deemed consistent with the General Plan. Further, the certified EIR was prepared and deemed legally sufficient to serve as a project-level environmental document for subsequent actions such as re-zonings, pre-zonings, annexations and revisions to the San Rafael Municipal Code and regulations, as deemed necessary or recommended to implement provisions of the General Plan.

Since 2004, the San Rafael General Plan 2020 has been amended numerous times. In processing and adopting many of these subsequent amendments, the City has relied on use of the Plan's certified EIR for environmental review and clearance. In 2009, the City prepared and adopted an Addendum to the certified EIR (Addendum No. 1), which assessed a General Plan amendment to change the Plan-adopted traffic level of service (LOS) standard at the intersection of 3rd Street and Union Street. In 2011, the City prepared and adopted an Addendum to the certified EIR (Addendum No. 2), which assessed a General Plan Amendment for the current Housing Element (2009-2014), a New Sustainability Element and Greenhouse Gas (GHG) Reduction Strategy, an amendment to Conservation Element Policy CON-3, as well as the elimination of the Project Selection Process (PSP).

The General Plan and EIR are available for review at the following location:

City of San Rafael Community Development Department  
1400 5th Avenue, 3rd floor,  
San Rafael, California 94915

The General Plan is also available on the City's website, which can be accessed at:

[http://www.cityofsanrafael.org/Government/Community\\_Development/General\\_Plan\\_2020.htm](http://www.cityofsanrafael.org/Government/Community_Development/General_Plan_2020.htm)

## C. PROJECT DESCRIPTION

In accordance with State law, the City is proposing to update its currently adopted Housing Element (2011) with the proposed 2015-2023 Housing Element Update. The intent of the Housing Element Update is to document the projected housing needs within the community and to set forth policies and programs that promote the development of diverse housing types and ensure affordability of housing Citywide. The Housing Element Update does not propose development of any residential uses, nor does it require that any residential uses be constructed. The purpose of the General Plan Housing Element is to establish local goals, policies, and programs that the City will implement in order to address identified housing issues.

As mandated by state law, the Housing Element must be updated in review period cycles as defined by California Government Code Section 65588 in order to establish and update housing and land use strategies reflective of changing needs, resources, and conditions. A Housing Element that has been accepted for streamlined review by the Department of Housing and Community Development (HCD) can pursue updates on an eight year cycle. Those not qualified for streamline review are required to follow a four year cycle.

As part of the Housing Element Update, the City of San Rafael has assessed existing policies and programs within the currently adopted Housing Element and analyzed the need for changes. The focus and intent of programs established in the currently adopted Housing Element will be carried over with minimal changes overall. Many programs will require little to no change, while others will be updated as necessary to keep the programs relevant for the next Housing Element cycle. A number of other programs will be consolidated but will retain the intent of each component program. This process of merging programs will help streamline the programs section, reducing redundancies and linking separate but related programs. For programs that have been rendered unnecessary or unsuitable for continuation, deletion has been proposed. Such programs include performing tasks that are done as a matter of course and conducting activities that are no longer applicable due to the loss of the San Rafael Redevelopment Agency in 2012. The overall result of the Housing Element programs update is small changes in terms of the content of programs, with revisions made to renew programs as required for the new Housing Element cycle or streamline the organization of the programs section.

Several existing programs are retained based on continuing activities, partial accomplishments and limited opportunities to implement actions in a program. In particular, those programs related to innovative housing are being carried forward as a result of no application being submitted during the previous iteration of the Housing Element. Many such programs were originally proposed as short term programs, but are being revised as long term programs.

Other components of the Update include an assessment of existing and future housing needs, constraints on housing, housing programs, and quantified objectives. The Housing Element establishes the framework for the City to meet its obligation for the Regional Housing Needs Allocation (RHNA).

The RHNA allocation determines the amount of affordable housing that the City should plan for and therefore informs land use policy, housing programs and infrastructure improvements. The 2014-2022 RHNA allocation calls for a demonstrated planning capacity of 1,007 housing units, which is addressed in the 2015-2023 planning period of the Housing Element. The table below shows the required distribution of housing amongst income levels:

**San Rafael’s Regional Housing Need  
By Household Income, 2015 - 2023**

|  |                                  |
|--|----------------------------------|
| Very Low Income Households   | 240 (Extremely low income*: 120) |
| Low Income Households  | 148                              |
| Moderate Income Households   | 181                              |
| Above Moderate Income Households   | 438                              |
| <b>Total Housing Need</b>  | <b>1,007</b>                     |
| * Extremely low income household need is a subset of very low income household need. |                                  |

In addition to accommodating the updated RHNA allocation, the City’s Housing Element must also comply with recent legislation. The new legislation includes the following: Senate Bill 2, which provides that transition and supportive housing be treated as a residential use and requires emergency shelters by right in selected areas or established zoning districts; Assembly Bill 1866, which addresses Accessory Dwelling Unit and Second Dwelling Unit Law; Senate Bill 375, requiring compliance with the Sustainable Communities Strategy; Senate Bills 520 and 812, providing reasonable accommodations for persons with disabilities; and Government Code 65915 (the State Density Bonus Law). The City is also prepared to address the recently signed Assembly Bill 1537, which defines requirements pursuant to a jurisdiction’s size.

The Update of the Housing Element for the 2015-2023 planning period includes minimal programmatic changes. There are no changes to existing land uses designation or zoning proposed as part of the Update. The RHNA allocation of 1,007 housing units remains consistent with the General Plan buildout intensity and population projections analyzed in the EIR.

The Housing Element Update consists of the following key components:

Housing Needs Assessment (Appendix B-1 to the Housing Element); Sites Inventory and Capacity Analysis (Appendix B-3 to the Housing Element)

This assessment analyzes population demographics, identifies special housing needs for sensitive population, evaluates housing conditions, and provides information on the housing stock characteristics for the City of San Rafael. According to the City’s projections, there will be surplus capacity of 443 units affordable to very low- and low-income households. The City also expects to have surplus capacity of 207 units affordable to moderate-income households and 758 surplus units affordable to above moderate-income households. Therefore, the City has the ability to meet the RHNA requirements with changes to the City’s Land Use Map and/or Zoning Map.

Evaluation of Accomplishments (Appendix B-5 to the Housing Element)

This discussion contains a review of the previous Housing Element including achievement of programs, an assessment of the effectiveness of programs, and a determination to carry forward, amend or discontinue programs. Based on the evaluation conducted for the goals and policies

contained in the current Housing Element, various text modifications, amendments, and deletions have been proposed for the Housing Element Update in order to reflect the changing needs, resources, and conditions present in the city and the region.

The key changes proposed in the Housing Element Update are summarized below:

1. The dissolution of the San Rafael Redevelopment Agency in 2012 has resulted in changes that reference funding and management by this agency. The responsibilities previously held by the Redevelopment Agency have been shifted to the Economic Development Division of the City Manager's Office, Community Development Department and other City departments and agencies, as appropriate.
2. The time frames for implementing certain programs have been updated and revised.
3. Consolidation of duplicative programs and a relocation of programs to achieve efficiency in the presentation of material, enhance readability and ensure consistency with the goals of the Element.
4. Revised Program H-7b sets the objective to conserve very low income rental units at risk of conversion. New Program H-7c sets objectives to monitor affordable units owned by non-profits as required by funding sources and by private entities as necessary pursuant to City inclusionary requirements.
5. New Program H-9c proposed coordination and outreach with organizations assisting persons with disabilities in finding housing.
6. A new Program H-11b is proposed to evaluate appropriate zoning regulations to support with the creation of a "Junior Second Units" provision, which will allow for the repurposing of existing space within a single-family dwelling unit to create a semi-private living space for a renter or care giver in conjunction with the owner-occupied unit.
7. New Program H-12d consolidates Existing Program H-16d (Emergency Shelters) and Existing Program H-16e (Transitional and Supportive Housing) and is refined to reflect zoning code amendment adopted with SB2 to allow shelters by right and to explicitly provide for transitional and supportive housing as a residential use.
8. Revised Program H-14c (Continue to Implement Zoning to Encourage Mixed Use), New Program H-17c (Waiver or Reduction of Fees), and New Program H-17d (Efficient Project Review) are amended and added, to address issues related to processing and permit procedures.
9. New Program H-15a consolidates existing Programs H-18g, H-21d, H-22a (High Density Infill Housing Near Transit), H-22b (Station Area Plans), and H-23a by proposing to complete the Station Area parking study and Transit Center relocation analysis in 2015 to address housing for the Downtown SMART station area plan.
10. New Program H-15b Civic Center Station Area Plan proposes to guide development around the station area through consideration for station access and transportation connection of various modes.

11. New Program H-16a consolidates existing programs H-25a to H-25f and establishes objectives for second units.
12. New Policy H-17 (Regulatory Processes and Incentives for Affordable Housing) is proposed with consolidation of existing programs including H-21a (State Density Bonus Law), H-21c (Height Bonuses), H-25a to H-25f, and H-5b and H-18c.
13. Refined Program H-18a proposes the development of an Inclusionary Housing Nexus Study and evaluation of in-lieu fees.
14. New Program H-19a references the Sustainability Element to guide energy conservation and sustainability in housing development.
15. Some programs are proposed to be deleted because they have been: a) implemented; b) rendered obsolete due to the dissolution of Redevelopment; or c) done as a matter of course and would be unnecessary to call out.
16. The Housing Element Background Report Appendix B has been revised to incorporate updated data on population demographics, housing profiles, and incomes; household characteristics; Housing Stock Characteristics; and Special Needs Populations. This report is organized to match the State of California Department of Housing and Community Development (HCD) format. Further, the list of housing sites in this report have been updated to reflect the current sites available for development.

The Housing Element Update does not result in any of the following:

- Changes to the adopted residential land use designations or their respective density parameters;
- Changes to the adopted land use designations for, or the rezoning of individual properties/sites; or
- Increase in the housing projections from those projections published in the currently adopted Housing Element.

#### **D. ENVIRONMENTAL ANALYSIS**

The required environmental review for the proposed Housing Element Update commenced with a review of the 2004 certified San Rafael General Plan 2020 EIR. An Initial Study checklist was prepared to determine if the proposed Housing Element Update would result in any new significant impacts, an increase in the severity of impacts, or new or expanded mitigation measures from those analyzed in the General Plan EIR. The following section of this document provides the rationale for the preparation of an addendum and a summary of analysis and findings of the addendum for each environmental category reviewed.

#### **Rational for Preparation of EIR Addendum**

Since the General Plan EIR has been certified, the environmental impacts of all subsequent activities must be examined in light of the impact analysis in the certified EIR to determine if additional CEQA documentation must be prepared. One of the standards that apply is whether,

under Public Resources Code Section 21166 and State CEQA Guidelines Sections 15162 and 15163, there are new significant effects, changes in circumstance or other information that require preparation of a subsequent EIR or supplemental EIR. CEQA Section 15164 states that, “the lead or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for a subsequent EIR have occurred.”

In determining whether an addendum is the appropriate document to analyze the modifications to the project and its approval, State CEQA Guidelines Section 15164 (Addendum to an EIR or Negative Declaration) states:

*(a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

*(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*

*(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

*(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*

*(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency’s required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

New significant effects or other grounds require preparation of a subsequent EIR or supplemental EIR in support of further agency action on a project pursuant to Public Resources Code Section 21166 and State CEQA Guidelines Sections 15162 and 15163. Under these guidelines, a subsequent or supplemental EIR shall be prepared if any of the following criteria are met.

*(a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*

*(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

*(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*

*(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*

*(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*

*(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

*(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative;* or

*(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

This document serves as the Addendum to the Final Environmental Impact Report (FEIR) prepared for the City of San Rafael General Plan. The Addendum has been drafted pursuant to Section 15164 of CEQA and provides evidence demonstrating that the proposed Housing Element Update is consistent with the certified General Plan EIR.

As demonstrated herein, the proposed changes set forth in the Housing Element Update do not meet the criteria for requiring preparation of a Subsequent or Supplemental EIR, CEQA Section 15162 and 15163 respectively. The Housing Element Update will not result in one or more significant effects not previously discussed in the General Plan EIR, nor does the Update create substantially more severe significant effects than previously examined. Additionally, none of the conditions analyzed under the certified General Plan EIR have substantially changed.

The City of San Rafael, as the lead agency, supports and recommends an Addendum rather than the preparation of a Subsequent EIR or Supplemental EIR. Therefore, the Housing Element Update may be approved as activity covered within the scope of the 2004 certified General Plan EIR. The purpose of this review is to determine if the project would result in new significant impacts, an increase in the severity of impacts, or new or expanded mitigation measures from those analyzed and determined in the General Plan EIR. The following presents those General Plan EIR impacts and recommended mitigation measures that are pertinent to the project, and compares the proposed project activities to these impacts and measures. The discussion is organized by the chronological order of topic areas presented in the Initial Study:

## Impacts Summary Table

| GENERAL PLAN EIR IMPACT  | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE   | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)   |
|--|---|---|
| <b>AESTHETICS</b>  |   |   |
| <p>Impact IV. 7-4 Light and Glare</p> <p>GP EIR determined that development facilitated by GP could produce new sources of light and glare. Considered significant before mitigation/ Less than significant after mitigation</p> | <p>Mitigation Measure IV.7-4: new projects proposing parking lot improvements to prepare lighting plan that incorporate measures as set forth in CD-19b “Lighting Plan”</p> | <p>No change. All new development facilitated by the Housing Element Update is subject to the General Plan and measures outlined in GP Policy CD-19b, with adherence to this measure impacts will be less than significant.</p>   |
| <b>AIR QUALITY</b>   |   |   |
| <p>Impact IV.3-1. Consistency with Clean Air Plan. General Plan EIR determined that there would be a less-than-significant to the Clean Air Plan.</p>  | <p>No mitigation required.</p>  | <p>No change. The proposed update to the Housing Element would result in no changes to: adopted residential land use designations or their respective density parameters; adopted land use designations or zoning for individual properties/sites; or housing projections from those currently adopted in the General Plan. Therefore, this action would have no impact on General Plan consistency with the Bay Area Air Plan.</p> |
| <p>Impact IV.3-2. Consistency with Clean Air Plan transportation control measures. General Plan EIR determined that there would be to be less-than-significant impacts to Clean Air transportation control measures.</p>         | <p>No mitigation required.</p>  | <p>No change. The proposed update to the Housing Element would result in no changes to the adopted Sustainability Element and GHG Emissions Reduction Strategy, which ensure consistency with the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines for promoting transportation control measures.</p>  |

| GENERAL PLAN EIR IMPACT  | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE  | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)  |
|--|--|--|
| <p>Impact IV.3-3. Odor/toxics buffer zones.</p> <p>The GP EIR determined that in the absence of buffer zones from major mobile sources of toxic contaminants impacts would be potentially significant before mitigation.</p> | <p>Mitigation Measure IV.3-3. Adopted Program AW-2a (Sensitive Receptors) required that all projects considered “sensitive receptors” (e.g., housing, schools, child care) proposed within 500 feet of the closest lane of US 101 or I-580 be subject to review of health risks.</p> | <p>No Change. As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected and all impacts would remain at levels below significant.</p> |
| <b>BIOLOGICAL RESOURCES</b>  |  |  |
| <p>Impact IV.8-1. Special-Status Plant and Animal Species. The GP EIR determined that the 2020 GP could directly and/or indirectly affect special status plants and animals before mitigation.</p>                           | <p>Mitigation Measure IV.8-1 introduced CON-14a requiring survey of vacant lots prior to development approval and CON-14b requiring minimization of impacts to special status species where impacts found to be unavoidable. After mitigation Impacts are Less than significant</p>  | <p>No Change. As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected and all impacts would remain at levels below significant.</p> |

| GENERAL PLAN EIR IMPACT  | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE   | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)  |
|--|---|--|
| <p>Impact IV.8-2. Sensitive Natural Communities. The GP EIR determined that implementation of the 2020 GP may directly or indirectly impact undeveloped areas.</p>   | <p>Mitigation measure IV.8-2 requires the adoption of Conservation Policy CON-10a, which requires the protection of oak savanna and oak woodland habitat when assessing development in these areas.</p> | <p>No Change. As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected and all impacts would remain at levels below significant.</p> |
| <p>Impact IV.8-3. Federally Protected Wetlands. The General Plan determined that there would be less-than-significant impacts to protected wetlands, provided that Conservation Element policies and programs were included in the adoption of the Plan.</p>   | <p>No mitigation required.</p>  | <p>No change. There are no components of the project that would alter policies adopted under the Conservation Element. Thus, the project is consistent with the General Plan and ne new impacts would occur.</p>                               |
| <b>GEOLOGY AND SOILS</b>   |   |  |
| <p>Impact IV.9-1 Seismic Ground Shaking. The GP EIR determined that new development would likely be subject to some level of seismic ground shaking and found this impact to be significant and unavoidable.</p> <p>Impact IV. 9-2 Seismic related ground failure. The GP EIR determined that exposure to adverse seismic effects would be a significant impact.</p> | <p>Mitigation Measure IV. 9-1: Required post-earthquake inspections of critical facilities. With mitigation, impacts would be less than significant. (applicable to both impact categories)</p>         | <p>No Change. As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected and all impacts would remain at levels below significant.</p> |

| GENERAL PLAN EIR IMPACT  | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE  | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)  |
|--|--|--|
| Impact IV. 9-3 Land sliding. GP EIR found that development consistent with 2020 GP could expose people to effects of landslides and this would be a potentially significant impact.  | Mitigation Measure IV.9-3 requires that the City develop and adopt a City landslide policy. With mitigation impacts would be less than significant.                          | There would be no change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan and no new impacts are expected. |
| Impact IV.9-4 Subsidence. The GP EIR found that development consistent with 2020 GP could expose people to effects of subsidence and this would be a potentially significant impact. | Mitigation Measures IV.9-4(a) and 4 (b) requires that the City amend policy S-21 Rise in Sea Level and that the City adopt a program for S-20 Levee Upgrading, respectively. | No Change. As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected and all impacts would remain at levels below significant.                              |
| Impact IV.9-5 Erosion  | Mitigation Measure IV.9-5 requires that the City shall amend Policy NH-68 Shoreline Embankments. With mitigation impacts were found to be less than significant.             | No Change. As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected and all impacts would remain at levels below significant.                             |

| GENERAL PLAN EIR IMPACT  | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE   | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)   |
|--|---|---|
| <p>IV. 9-7 Septic Suitability of Soils. The GP EIR Determined that the installation of septic systems on inadequate soils would be a potentially significant impact.</p> | <p>Mitigation Measure IV.9-7 requires the City adopt a GP Policy discouraging the use of septic systems in the planning area. If no other alternatives exist than a soil test is required. With mitigation impacts are less than significant.</p> | <p>No Change. As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected and all impacts would remain at levels below significant.</p>  |
| <b>LAND USE, POPULATION, EMPLOYMENT AND HOUSING</b>  |   |   |
| <p>Impact IV.1-1. Conflict with applicable land use or other plans. The GP EIR determined that there would be less-than-significant impacts.</p>                         | <p>No mitigation required.</p>  | <p>No change. The update of the Housing Element proposes no changes to a land use plan that would result in a conflict causing increased or new impacts.</p>  |
| <p>Impact IV.1-2. Incompatible land uses and changes to neighborhood character. The General Plan EIR determined that there would be less-than-significant impacts.</p>   | <p>No mitigation required.</p>  | <p>No change. The update to the Housing Element would not increase the severity of this impact or result in a new impact. As discussed, the project proposes no changes to land use assumptions or designations that would result in incompatible land uses or a change in the character of a neighborhood.</p>                               |
| <p>Impact IV.1-3. Growth and concentration to population. The General Plan EIR determined that there would be less-than-significant impacts.</p>                         | <p>No mitigation required.</p>  | <p>No change. The update to the Housing Element proposes no changes to the adopted Urban Service Area or Sphere of Influence boundaries. Further, as discussed above, the project proposes no changes to land use assumptions or designations that would result in incompatible land uses or a change in the character of a neighborhood.</p> |

| GENERAL PLAN EIR IMPACT  | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE  | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)   |
|--|--|---|
| Impact IV.1-4. Employment growth rate. The General Plan EIR determined that there would be less-than-significant impacts.  | No mitigation required.  | No change. None of the components of the project would result in a substantial increase in the employment projected under the San Rafael General Plan 2020.   |
| Impact IV.1-5. Jobs-to-housing ratio. The General Plan EIR determined that there would be less-than-significant impacts.   | No mitigation required.  | No change. None of the components of the project would result in a substantial change in the jobs-to-housing ratio that is projected under the San Rafael General Plan 2020.                                    |
| <b>NOISE</b>   |  |   |
| IV.4-2. Increased Rail Noise.  | Mitigation Measure IV.4-2. This measure requires that a detailed noise assessment be conducted to assess noise and vibration impacts associated with the SMART rail service. | No Change. As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected beyond those previously analyzed. |
| <b>HAZARDOUS MATERIALS</b>   |  |   |
| Impact IV.5-3 Release of Hazardous Materials. GP EIR indicates that development consistent with the 2020 GP could cause a release of hazardous materials that would be a significant impact. | Mitigation Measure IV. 5-3 requires that policy S-13 be introduced requiring remediation and cleanup for any sites having had past contamination.                            | No Change As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected beyond those previously analyzed.  |

| GENERAL PLAN EIR IMPACT   | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE   | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)   |
|---|---|---|
| Impact IV.5-4 Hazardous Materials, substances or wastes near schools. The GP EIR indicated that because the 2020 GP would allow for the transportation, storage, use and or disposal of hazardous materials within ¼ mile of a school the associated impacts are potentially significant. | Mitigation Measure IV.5-4 introduces GP policy S-11 requiring survey of existing industrial facilities located adjacent to schools and restricting the siting of hazardous waste-related facilities near schools.           | No Change As the Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected beyond those previously identified.   |
| <b>PUBLIC SERVICES AND UTILITIES</b>  |   |   |
| Impact IV.5-6 Police Services. The GP EIR found that development consistent with the 2020 GP would generate demand for police services beyond the available capacity. This was found to be a potentially significant impact.  | Mitigation Measure IV.5-6(a) and (b) introduces S-39a, Public Safety Facilities, to encourage the Police Dept. to identify needs and construct or renovate facilities. However, impacts remain significant and unavoidable. | No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected beyond those previously identified. |
| Impact IV.5-8 Parks, The GP EIR determined that development consistent with the 2020 GP may further exacerbate the existing deficiency in park facilities and this would be a potentially significant impact.   | Mitigation Measure IV.5-8 recognizes that impacts would be minimized through adherence to GP policies, however, impacts remain significant and unavoidable.   | No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan No new impacts are expected beyond those previously identified.  |

| GENERAL PLAN EIR IMPACT  | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE   | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)   |
|--|---|---|
| Impact IV.5-9 Library Services. The GP EIR found that development consistent with 2020 GP could increase the demand for library services beyond the current capacity which would be a potentially significant impact.                      | Mitigation Measure IV.5-9 recognizes that impacts would be minimized through adherence to GP policies, however, impacts remain significant and unavoidable.   | No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected beyond those previously identified. |
| Impact IV.5-11 Wastewater treatment capacity – South of Puerto Suello Hill. The GP EIR found that development consistent with the 2020 GP could generate wastewater flows that exceed the capacity of the Central Marin Sanitation Agency. | Mitigation Measure IV.5-11(a) and (b) require that that the CMSA perform a Capacity Management Alternative Study.   | No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected beyond those previously identified. |
| Impact.5-12 Water Supply. The GP EIR found that development consistent with the 2020 GP could increase the demand for water in the planning area which would constitute a project specific and cumulative impact.                          | Mitigation Measure IV.5-12(a) and (b) requires that the MMWD research and implement water conservation facilities and identify new water supply sources. However, this impact remains significant and unavoidable | No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected beyond those previously identified. |

| GENERAL PLAN EIR IMPACT   | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE   | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)  |
|---|---|--|
| <b>TRANSPORTATION/TRAFFIC</b>   |   |  |
| Impact IV.2-1. Level of Service at intersections approved to acceptable levels of service with General Plan 2020. The General Plan determined that there would be less-than-significant impacts to intersections adopted with specific, acceptable LOS standards. | No mitigation required.   | No change. The proposed update to the Housing Element would result in no changes to: adopted residential land use designations or their respective density parameters; adopted land use designations or zoning for individual properties/sites; or housing projections from those currently adopted in the General Plan. Therefore, this action would have no impact on adopted LOS standards.                             |
| Impacts IV.2-2, IV.2-3, IV.2-4, IV.2-5. Impacts to levels of service at specific intersections. The GP EIR determined that there would be significant and unavoidable impacts at specific intersections.  | No mitigation measures available or adopted to reduce impacts to acceptable level. Found to be significant and unavoidable              | No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan no new impacts are expected. The Update would have no impact on intersections projected to operate below the adopted LOS standards. There would be no new impacts beyond those previously identified. |
| Impact IV.2-6. Unacceptable City roadway segment level of service resulting from San Rafael General Plan 2020. The General Plan EIR determined that there would be significant and unavoidable impacts along specific roadway segments.                           | Impact determined to be significant and unavoidable. No mitigation measures available or adopted to reduce impacts to acceptable level. | No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected beyond those previously identified.  |

| GENERAL PLAN EIR IMPACT   | GENERAL PLAN EIR ADOPTED MITIGATION MEASURE   | RELATIONSHIP TO PROPOSED PROJECT (HOUSING ELEMENT UPDATE)   |
|---|---|---|
| <p>Impact IV.2-7. City roadway segment level of service resulting from San Rafael General Plan 2020.</p> <p>The General Plan determined that there would be less-than-significant impacts to selective City roadway segments.</p>               | <p>No mitigation required.</p>  | <p>No change. The proposed update to the Housing Element would result in no changes to: adopted residential land use designations or their respective density parameters; adopted land use designations or zoning for individual properties/sites; or housing projections from those currently adopted in the General Plan. Therefore, this action would have no impact on traffic or LOS at intersections that projected to operate below the adopted LOS standards.</p> |
| <p>Impact IV.2-9 LOS along US 101 and I-580 Mainlines resulting from 2020 GP. Implementation of the GP would cause some freeway segments to deteriorate to below significant levels and this is considered a potentially significant impact</p> | <p>GP EIR determined impact to be significant and unavoidable. No mitigation measures available to further reduce this impact</p> | <p>No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected beyond those previously identified.</p>  |
| <p>Impact IV. 2-13 Removal of on-street parking spaces along Lincoln Avenue. The GP EIR determined that the removal of on-street parking spaces required to improve traffic flow would be a potentially significant impact.</p>                 | <p>GP EIR determined impact to be significant and unavoidable. No mitigation measures available to further reduce this impact</p> | <p>No change or increase in the severity of the significant and unavoidable impact. The Housing Element does not propose any land use or zoning changes and will comply with the policies set forth in the General Plan. No new impacts are expected beyond those previously identified.</p>  |

**E. INITIAL STUDY CHECKLIST**

# Initial Study Checklist

- |   |   |
|---|---|
| <b>1. Project Title</b>                                 | Housing Element Update (5-Year Review)<br>2015-2023   |
| <b>2. Lead Agency Name &amp; Address</b>                | City of San Rafael<br>Community Development Department<br>Planning Division<br>1400 Fifth Avenue (P.O. Box 151560)<br>San Rafael, California 94915-1560                       |
| <b>3. Contact Person &amp; Phone Number</b>             | Paul A. Jensen, Community Development Director<br>Phone number: (415) 485-5064<br>Email: <a href="mailto:paul.jensen@cityofsanrafael.org">paul.jensen@cityofsanrafael.org</a> |
| <b>4. Project Location</b>                              | The proposed project is not site-specific, but addresses policies, programs and strategies that are applicable citywide.  |
| <b>5. Project Sponsor's Name &amp; Address</b>          | City of San Rafael<br>1400 5 <sup>th</sup> Avenue<br>P.O. Box 151560<br>San Rafael, CA 94915-1560   |
| <b>Other Public Agencies Whose Approval Is Required</b> | State of California Department of Housing and Community Development (HCD)   |

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

None of the following environmental categories would be potentially affected, as indicated by the following evaluation of environmental impacts.

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Aesthetics               | <input type="checkbox"/> Agriculture Resources       | <input type="checkbox"/> Air Quality                       |
| <input type="checkbox"/> Biological Resources     | <input type="checkbox"/> Cultural Resources          | <input type="checkbox"/> Geology /Soils                    |
| <input type="checkbox"/> Greenhouse Gas           | <input type="checkbox"/> Hazards & Hazardous         | <input type="checkbox"/> Hydrology / Water Quality         |
| <input type="checkbox"/> Land Use / Planning      | <input type="checkbox"/> Mineral Resources           | <input type="checkbox"/> Noise                             |
| <input type="checkbox"/> Population / Housing     | <input type="checkbox"/> Public Services             | <input type="checkbox"/> Recreation                        |
| <input type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory 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, in preparing the attached Initial Study, the proposed project would not result in any new significant information, new significant impacts or new mitigation measures that had not been previously considered, analyzed or disclosed in the San Rafael General Plan 2020 certified EIR (ENVIRONMENTAL IMPACT REPORT). Consistent with CEQA Guidelines Section 15164, an ADDENDUM to the certified ENVIRONMENTAL IMPACT REPORT will be prepared.

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Approved By: Paul A. Jensen, Community Development Director, City of San Rafael

# EVALUATION OF ENVIRONMENTAL IMPACTS

## I.AESTHETICS

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

Sources: 1, 2, 3, and 7

### Aesthetics Impact Discussion:

**a) Less than Significant Impact.** Adoption of the proposed 2015-2023 Housing Element update will not have a substantial direct or indirect impact on scenic vistas. Any future development project made possible by the updated housing element will be subject to individual, site-specific environmental review, as required by CEQA as well as all development standards and building code regulations required by State law and City policy.

**b) Less than Significant Impact.** The updated Housing Element provides policies and programs that are broadly applied citywide and are not site-specific. Potential environmental impacts to scenic resources may be realized or determined when the policies or programs are considered on a site-specific or project-specific basis. The General Plan contains several policies regarding the preservation of scenic roads and highways. The individual impacts of these types of activities will be assessed at the time of specific project review. Potential environmental impacts to scenic resources within a state highway may be realized or determined when the policies or programs are considered on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. No impacts beyond those identified in the General Plan EIR are anticipated, and thus the Housing Element Update will have less than significant impacts to scenic resources.

**c) Less than Significant Impact.** Potential environmental impacts to the visual character or quality of a specific site and its surroundings may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of future development to the visual character and quality of the site will be

assessed at the time of specific project review. Impacts from future growth and infill development associated with residential land uses have been previously identified in the General Plan EIR and would be required to be consistent with existing adopted General Plan policies that preserve the visual character and ensure compatibility. No impacts beyond those identified in the General Plan EIR are anticipated, and thus the Housing Element update would result in less than significant impacts to the environment due to a degradation of the visual character and quality.

**d) Less than Significant Impact.** The updated Housing Element provides policies and programs are broadly applied citywide and are not site-specific. Potential environmental impacts associated with new sources of light or glare may be realized or determined when the policies or programs are considered on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. No impacts beyond those identified in the General Plan EIR are anticipated, and thus the Housing Element updated would result in less than significant impacts to the environment due to introduction of light and glare.

**II.AGRICULTURAL AND FORESTRY RESOURCES**

| Would the project:   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| 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 51104(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 conversion of forest land to non-forest use?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

Sources: 1, 2, 3, and 7

**Agricultural and Forestry Resources Impact Discussion:**

- a) **No Impact.** The City of San Rafael does not contain any prime or unique farmland, nor does it contain any Farmland is Statewide importance. Adopting the 2015-2023 Housing Element update will not by itself result in impacts to farmland or agricultural uses located within the City limits.
  
- b) **No Impact.** The City of San Rafael planning area does not contain any land that is zoned for agricultural use or is under a Williamson Act contract. No impacts beyond those identified in the General Plan EIR are anticipated, and thus the Project will not have a significant effect on the environment.
  
- c) – e) **No Impact.** The City of San Rafael does not contain any land that is zoned for forest land or is protected under the Timberland Production zone. Impacts to agricultural resources from future growth have been previously identified in the General Plan EIR. Sites for future residential development are zoned appropriately and most development will be as urban infill within land use currently designated for residential uses. No lands in the General Plan area designated for agriculture, forestry or timberland will be rezoned or otherwise affected by the proposed Housing Element Updated. Thus, the proposed Update will have no impact to such resources.

**III.AIR QUALITY**

| Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Exposure of sensitive receptors to substantial pollutant concentrations?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Sources: 1, 2, 3, 4, and 7

**Air Quality Impact Discussion:**

- a) – c) **Less than Significant Impact.** The Bay Area Air Quality Management District (BAAQMD) is the agency with regulatory authority for air quality in the Bay Area region, including the City of San Rafael. BAAQMD has adopted the Clean Air Plan (CAP), which aims to attain air quality standards, reduce exposure to pollutants, protect public health and reduce GHG emissions and protect the climate. The CAP identified 55 control measures that are presented in order to reduce air pollution throughout the Bay Area and include measures such as promoting mixed-use transit-oriented and compact development, dust management, water conservation, VMT reduction, energy efficiency and waste management, among others.

The City's General Plan is considered to be consistent with the CAP since it supports the primary goals, includes control measures, and does not conflict with or disrupt implementation of control measures. Similarly, the proposed Housing Element Update is also determined to be consistent with the CAP as there would not be conflict with CAP implementation due to updates in proposed policies and programs set forth therein. The Housing Element Update is broadly applied citywide and is not site-specific. The potential for conflict with Bay Area Air Plan may be realized or determined when the proposed policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review.

The proposed Housing Element Update would not result in a potential for conflict with the adopted Clean Air Plan since the proposed policies and programs there would not:

- Change or adjust the adopted land use designations in the General Plan or their respective density parameters;
- Change the adopted land use designations or planned land uses for individual properties or sites;
- Change residential land use projections that would result in new traffic generation or increased air pollutants from those levels projected under the currently adopted San Rafael General Plan 2020 or the Clean Air Plan.

In addition, the City recently adopted a GHG Reduction Plan that incorporates the implementation measures of the City-adopted CCAP, which includes recommendations such as improving the pedestrian/bicycle infrastructure (NTPP), promoting transit-oriented development (TODs), supporting transit services, and SMART station planning, which would reduce vehicle miles traveled, resulting in decreased air pollutants. The subject Housing Element Update does not conflict with implementation of the Reduction Plan or the CCAP.

The potential to violate an air quality standard may be realized or determined when the proposed policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. No impacts beyond those identified in the General Plan EIR are anticipated. Thus, the Project will have a less than significant effect on the environment as a

result of conflict with an adopted air quality plan and/or an individual or cumulative violation of applicable air quality standard.

- d) **Less than Significant Impact.** The exposure of sensitive receptors such as new housing would be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review.

The update to the Housing Element does not introduce any changes to the existing land use designations of specific properties, nor would it change or increase housing development projections for the planning area that would further expose potential housing to substantial pollutant concentrations beyond what has previously been analyzed. Increased density proximate to high transit areas could be exposed to elevated pollutant concentrations; however, site-specific analysis will be conducted at the project level in order to assess exposure of sensitive receptors.

Policies and programs provide for the protection of sensitive receptors and require site-specific analysis where concentrations may be elevated. As the plan areas are developed and more specifics on housing opportunities and recommendations are identified and formalized, a detailed assessment of exposure to pollutant concentrations will be prepared. At the time of environmental review, the technical studies will be required to address potential pollutant concentrations and health risk exposure.

The proposed Housing Element Update does not introduce any policies or programs that would conflict with adopted standards to protect sensitive populations to air quality pollutants. Therefore, impacts would be less than significant.

- e) **Less than Significant Impact.** The creation of potential, objectionable odors may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. Adopting the Housing Element Update will not by itself create objectionable odors affecting a substantial number of people. No new or increased impact as a result of the Housing Element Update will result in effects beyond what is already anticipated in the General Plan EIR. Therefore, impacts would be less than significant.

#### IV. BIOLOGICAL RESOURCES

| Would the project:  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (Formerly Fish and Game) or U.S. Fish and Wildlife Service? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife (formerly Fish and Game) or U.S. Fish and Wildlife Service?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Sources: 1, 2, 3, and 7

#### **Biological Resources Impact Discussion:**

- a) **Less than Significant Impact.** Adopting the 2015-2023 Housing Element update will not by itself have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a threatened, endangered, candidate, sensitive, or special status. Potential environmental impacts to special-status, sensitive or candidate species protected by regional plans, policies or regulations of CDFW or USFWS may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. CON-14a and CON-14b require that vacant sites be surveyed prior to development approval to assess biological resources onsite and avoid,

minimize or offset impacts, as appropriate. The individual impacts of these types of activities will be assessed at the time of specific project review. Therefore, impacts would be less than significant.

- b) **Less than Significant Impact.** The proposed Housing Element Update does not introduce any land use changes, zoning changes or policies that would conflict with the protection of sensitive natural communities including sensitive oak savannas and oak woodland communities. The goals and policies of the General Plan serve to protect wetlands, habitat for special-status species, native vegetation, wildlife habitat, and wildlife movement corridors. Additional biological and wetland assessments would be required as part of environmental review of future development. There are no changes to land use that would result from implementation of the proposed Update. There are no new or more severe impacts that would occur relative to what has previously been identified in the General Plan EIR. Therefore, impacts to sensitive communities would be less than significant.
- c) **Less than Significant Impact.** The 2020 General Plan establishes policies and programs for the protection of wetlands and other sensitive water bodies including creeks, drainage ways and baylands. The proposed Housing Element Update does not introduce any new impacts to biological resources beyond those identified in the General Plan EIR. Adopting the Housing Element will not by itself have a substantial effect on any federally protected wetlands or other sensitive water bodies. The proposed policies and programs contained in the Housing Element Update are broadly applied citywide and are not site-specific. Site-specific analysis of wetlands will occur at the time that development proposals are submitted and will be reviewed in accordance with adopted policies and programs including Conservation Element Policy CON-3. Thus, the proposed Housing Element Update would have less than significant impacts to sensitive water bodies.
- d) **Less than Significant Impact.** Potential environmental impacts to movement of corridors for wildlife may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. Adopting the Housing Element will not result in new or increased impacts beyond those already anticipated in the General Plan. Depending on the attributes of each individual development proposal, future development will be subject to additional environmental review and compliance with all applicable policies related to wildlife species including movement and corridors. Therefore, impacts to migration or movement corridors from implementation of the Housing Element Update would be less than significant.
- e) – f) **Less than Significant Impact.** The 2020 General Plan Conservation Element contains a number of goals and policies addressing the protection of biological resources. In addition, the San Rafael Municipal Code includes ordinances and regulations that address, among others: a) wetland protection (SRMC Chapter 14.13 Wetland Overlay District); and b) creek protection (SRMC Section 14.16.080 [Creeks and other water courses]). Potential conflicts with the Conservation Element policies and the zoning ordinance provisions and regulations may be realized or determined when the policies or programs are considered and applied on

a site-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. There are no adopted local, regional or state habitat protection plans that apply to the San Rafael planning area. Thus, impacts due to a conflict with an adopted policy, ordinance or Habitat Conservation Plan would be less than significant from the proposed Housing Element Update.

## V. CULTURAL RESOURCES

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

Sources: 1, 2, 3, and 7

### Cultural Resources Impact Discussion:

a) – d) **Less than Significant Impact.** Potential environmental impacts to historic, archaeological and paleontological resources may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. In reviewing these impacts on site specific projects, the City will continue to rely on review of the City-adopted Historical/Architectural Survey and CEQA Guidelines Section 15064.5 to determine the presence of historic resources. The City-adopted Archaeological Resource and Protection Procedures, including: a) a review of the City’s Past Finder archaeological sensitivity maps and property priority ranking to determine proximity to potential resources; b) consultation with the Northwest Information Center and local Native American tribe representatives for direction on needed study; c) the preparation of an archaeological resource assessment when deemed necessary; and d) implementation of protective measures such as avoidance, capping or relocation of resources, will be utilized for review of impacts associated with future development proposal. Adopting the 2015-2023 Housing Element update will not introduce any new programs or policies that would conflict with the protection and preservation of cultural resources. Therefore, impacts to cultural resources would be less than significant.

**VI.GEOLOGY AND SOILS**

| Would the project:   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| 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 Publication 42. | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ii. Strong Seismic ground shaking?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii. Seismic-related ground failure, including liquefaction?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iv. Landslides?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Result in substantial soil erosion or the loss of topsoil?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

Sources: 1, 2, 3, and 7

**Geology and Soils Impact Discussion:**

- a) **Less than Significant Impact.** Adopting the 2015-2023 Housing Element update will not by itself expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, strong seismic ground shaking, or seismic-related ground failure, including liquefaction and landslides. The San Rafael planning area contains no earthquake faults delineated on the Alquist-Priolo Earthquake Fault Zoning Map. Impacts to persons and property associated with seismic activity resulting from full build-out of the General Plan were addressed in the General Plan EIR. Potential environmental impacts associated with seismic ground shaking, ground failure

including liquefaction, landslides and other direct and secondary effect of seismic activity may be realized or determined when the policies or programs are considered and applied to a project or activity, on a site-specific or project-specific basis.

Depending on the attributes of each individual development proposal, future development will be subject to additional environmental review and geotechnical evaluation. Conformance with standard Uniform Building Code Guidelines would also minimize potential impacts from seismic shaking. There are no new or more severe impacts introduced as a result of the proposed Housing Element Update relative to what has previously been analyzed. Therefore, potential impacts would be less than significant.

- b) **Less than Significant Impact.** Adopting the Housing Element update will not by itself result in substantial soil erosion or the loss of topsoil. Impacts to soils resulting from the anticipated growth and development of the City were addressed in the General Plan EIR. No new or increased impact will result beyond what is already anticipated and analyzed in the General Plan EIR. Future development will be subject to additional environmental review and compliance with all applicable policies related to erosion. Therefore, the proposed Housing Element update would result in less than significant impacts due to soil erosion.
- c) – d) **Less than Significant Impact.** Geologic impacts resulting from the anticipated growth and development of the City were addressed in the General Plan EIR. No new or increased impacts will result above what is already anticipated in the existing environmental documents. Future development will be subject to additional environmental review and compliance with all applicable policies related to landslides, lateral spreading, subsidence, liquefaction, collapse, expansive soils and other soil stability concerns. Therefore, adopting the Housing Element updated would result in less than significant impacts.
- e) **No Impact.** The San Rafael planning area is served by the San Rafael Sanitation District and the Las Gallinas Valley Sanitary District, which provide domestic wastewater/sewer service to all properties. Alternative waste water disposal systems are not permitted within the urban service area. All future development will be required to connect to the existing wastewater system. The proposed update does not increase demands or necessitate additional capacity beyond what has already been anticipated. Therefore, there would be no impact due to use of alternative sewer systems, as none are permitted.

## VII.GREENHOUSE GAS EMISSIONS

| Would the project:   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Sources: 1, 2, 3, 4, and 7

### Greenhouse Gas Emissions Impact Discussion:

- a) – b) **Less than Significant Impact.** In 2009 the City of San Rafael adopted the Climate Change Action Plan 2009 (CCAP) in response to AB 32, the California Global Warming Solutions Act. The CCAP includes strategies for transportation, waste reduction, land use, energy conservation and sequestration. The City also adopted a “Sustainability Element” to the General Plan and developed a GHG Emissions Reduction Strategy.

The proposed Housing Element update does not conflict with implementation of the Sustainability Element nor does it interfere with implementation of the GHG Emissions Reduction Strategy. Any new GHG emissions may be realized or determined when the proposed policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review by either: a) complying with the measures in the developed checklist; or b) through preparation of an individual GHG emissions assessment.

The GHG Reduction Plan incorporates measures of the City-adopted CCAP, which includes recommendations such as improving the pedestrian/bicycle infrastructure (NTPP), promoting transit-oriented development (TODs), supporting transit services, and SMART station planning, which would increase the performance and safety of public transit, bicycle and pedestrian facilities. The Housing Element Update is consistent with all established State and local GHG reduction strategies and does not facilitate development that would conflict with the applicable GHG Plan or policies. Therefore, there would be less than significant impacts associated with greenhouse gas emissions from implementation of the proposed Housing Element update.

## VIII.HAZARDS/HAZARDOUS MATERIALS

| Would the project:   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?                                       | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport of public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Sources: 1, 2, 3, 5, 6 and 7

**Hazards and Hazardous Materials Impact Discussion:**

- a) – h) **Less than Significant Impact.** The proposed Housing Element Update would not result in new or increased severity in the significant hazard and human health impacts beyond what was addressed in the General Plan EIR. The amendments to the Housing Element are consistent with the development assumptions under the General Plan. The potential residential sites identified in the proposed Housing Element were considered in the General Plan EIR, and there would be no change regarding the generation of hazardous materials or exposure to existing or new sources of hazardous materials or other hazards. While there are no physical improvements proposed as part of the updates to the Housing Element, all future development projects would be subject to all applicable local, state, and federal regulations regarding the transportation, use, and disposal of hazardous materials, and to regulations regarding sites with contaminated soil or groundwater, as well as to further CEQA analysis of project-specific impacts. No new or increased severity of significant hazard impacts would occur beyond what was addressed in the General Plan EIR. Therefore, impacts would be less than significant.

## IX. HYDROLOGY AND WATER QUALITY

| Would the project:  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern on the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially alter the existing drainage pattern on the site or area, including through the alteration of the course of a stream or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Otherwise substantially degrade water quality?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| j) Inundation by seiche, tsunami, or mudflow?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Sources: 1, 2, 3, and 7

### **Hydrology and Water Quality Impact Discussion:**

- a) and f) **Less than Significant Impact.** The proposed Housing Element policies and programs are broadly applied citywide and are not site-specific. The updates do not change or revise current water quality standards. Further, potential environmental impacts from development and activities on a site that could violate water quality standards may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The EIR found that residential development will be located almost exclusively in urbanized areas, and that consistency with the 2020 General Plan, would ensure that no discernible effect on water quality would occur. The Housing Element Update does not introduce any new impacts or increase the severity of impacts to water quality beyond what was addressed in the General Plan EIR. The individual impacts of residential development will be assessed at the time of specific project review. Therefore, impacts to water quality from the proposed Housing Element update are less than significant.
- b) **Less than Significant Impact.** The proposed Housing Element policies and programs would neither result in a conflict with groundwater recharge nor would it deplete groundwater reserves. The EIR found that because future development would largely be confined to infill or redevelopment of previously developed sites there is little expectation that there would be a significant increase in impervious surfaces compared to existing conditions. Thus, there would be no new or more severe impacts to groundwater reserves relative to what was analyzed in the General Plan EIR. Therefore impacts would be less than significant.
- c) – d) **Less than Significant Impact.** The proposed Housing Element policies and programs would neither result in a conflict with groundwater recharge nor would it deplete groundwater reserves. As a policy and regulatory document, implementation of the Housing Element update will not alter existing drainage patterns in a manner that would result in substantial alteration of drainage patterns or increases in the rate or amount of surface runoff in a manner that would result in erosion or flooding on- or off-site. Potential environmental impacts from future development may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review.
- e) **Less than Significant Impact.** The proposed Housing Element policies and programs will not directly create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Stormwater runoff from future developed sites will be required to mimic pre-developed conditions and achieve low impact development (LID) standards. As such, upsizing of stormdrains may not be required with future development. Nonetheless, potential environmental impacts from development and activities will be reviewed and considered on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. As the proposed Housing Element update does not result in any new or more severe impacts than what was previously analyzed in the General Plan potential impacts are considered to be less than significant.

- g) – h) **Less than Significant Impact.** Implementation of the Housing Element update will not involve the exposure of people or structures to an elevated flood hazard beyond what has previously been identified. The sites identified for potential residential development in the Housing Element update could be located 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. The individual impacts of these types of activities will be assessed at the time of specific project review. As the proposed Housing Element update does not result in any new or more severe impact than what was previously analyzed in the General Plan potential impacts are considered to be less than significant.
- i) – j) **Less than Significant Impact.** Potential environmental impacts associated with a seiche or tsunami to development and activities on a site along the San Rafael bay front or within a FEMA flood hazard zone may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. As the proposed Housing Element update does not result in any new or more severe impacts than what was previously analyzed in the General Plan, potential impacts are considered to be less than significant.

## X.LAND USE AND PLANNING

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

Sources: 1, 2, 3, 4, 5, 6 and 7

### **Land Use and Planning Impact Discussion:**

- a) - c) **Less than Significant Impact.** The proposed Housing Element update does not introduce any new or amended policies and programs that would divide an established community. As proposed, implementation of the Housing Element update would not result in: a) any changes to the adopted residential land use designations or their respective density parameters; b) any changes to the adopted land use designations for individual properties or sites; and c) any changes to the housing projections. Therefore, the project is consistent with applicable land use plans, policies and regulations, and impacts would be less than significant.

## XI.MINERAL RESOURCES

| Would the project:  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

Sources: 1, 2, 3, and 7

### **Mineral Resources Impact Discussion:**

- a) - b) **No Impact.** The proposed Housing Element update does not change any mineral resource designations, operations or mineral resource goals or policies for the San Rafael Planning area. Thus, there would be no impact to mineral resources.

## XII.NOISE

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

Sources: 1, 2, 3, and 7

### **Noise Impact Discussion:**

- a) - b) **Less than Significant Impact.** There are no physical improvements proposed as part of the update to the Housing Element. All future development projects would be subject to applicable City noise standards. The Housing Element Update is consistent with the development potential of the General Plan and would not increase ambient noise or groundborne vibration beyond what was anticipated in the General Plan EIR. The proposed 2015-2023 Housing Element update will not by itself result in exposure of persons to or generation of noise levels in excess of established standard. The project proposes no changes to the current policies or standards of the San Rafael General Plan 2020 Noise Element or the City of San Rafael Noise Ordinance that would impact current noise standards or limits. Potential environmental impacts from development and activities on a site that could expose persons to excessive noise levels may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis.

The individual impacts of these types of activities will be assessed at the time of specific project review. Therefore, impacts due to excessive noise or vibration would be less than significant.

- c) - d) **Less than Significant Impact.** The Housing Element update will not by itself result in a substantial permanent or temporary increase in ambient noise levels in the City above existing levels. Potential environmental impacts from future development and activities could be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. There are no new noise impacts that would be realized from implementation of the proposed Housing Element Update. Impacts associated with temporary and permanent increase in ambient noise levels were addressed in the EIR for the General Plan. Therefore impacts due to temporary and permanent increased in ambient noise would be less than significant.
  
- e) - f) **Less than Significant Impact.** The Housing Element update will not by itself result in an increased exposure of people residing or working proximate to a public or private airport. There are no public airports in the City of San Rafael and there is one private airport, the San Rafael Airport, which is located in the Smith Ranch area. The Housing Element update does not propose any changes to the airport that would expose area residents to excessive noise levels. The individual impacts of future projects proximate to the airport will be assessed at the time of review for any specific residential projects. Therefore, impacts would be less than significant.

### XIII. POPULATION AND HOUSING:

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

Sources: 1, 2, 3, and 7

#### **Population and Housing Impacts Discussion:**

- a) **Less than Significant Impact.** The 2015-2023 Housing Element update will not by itself induce substantial population growth in the area. Population growth estimates for the Housing Element are based on adjusted state projections (ABAG 2013). The projections show a population of 68,700 in 2040 for the City. This is below that projected for buildout under the General Plan, which is 79,100. Therefore, population growth estimated for the Housing Element update is consistent with the General Plan. New housing development as infill development within the parameters of housing densities established by the Land Use Element will not induce substantial population growth beyond that estimated by the General Plan. Therefore, impacts would be less than significant.
- b) - c) **No Impact.** The Housing Element update will not result in the displacement of housing units or people, necessitating the construction of replacement housing elsewhere. The proposed policies and programs of the Housing Element Update are broadly applied citywide and are not site-specific. Potential environmental impacts from development and activities on a site that could result in the displacement of existing housing or the need to construct replacement housing may be realized or determined when the policies or programs are considered and applied on a site-specific or project-specific basis. The individual impacts of these types of activities will be assessed at the time of specific project review. Therefore, there would be no impact from the proposed update.

**XIV.PUBLIC SERVICES:**

| Would the Project:  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| <p>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:</p> <p>a) Fire protection? <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>b) Police protection? <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>c) Schools? <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>d) Parks? <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>e) Other public facilities? <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> |                                |  |                              |           |

Sources: 1, 2, 3, and 7

**Public Services Impacts Discussion:**

a) – e) **Less than Significant Impact.** The 2015-2023 Housing Element update will not impact public services. No changes are proposed to the Housing Element that would impact fire or police protection or result in new Fire or Police Department facilities. There are no changes proposed that would impact schools or result in the need for new school facilities. No parks or other public facilities would be impacted by the proposed Housing Element Update. As no specific project or improvement to a public building or facility is currently proposed, a site-specific impact cannot be analyzed. The individual impacts will be assessed at the time of specific project review. There are no new impacts to public services beyond what has been previously analyzed. Thus, the Housing Element would have less than significant impacts in fire and police protection, schools, parks and other facilities.

## XV.RECREATION

| Would the project:   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Sources: 1, 2, 3, 5 and 7

### **Recreation Impacts Discussion:**

- a) – b) **Less than Significant Impact.** The 2015-2023 Housing Element update will not impact regional parks or recreational facilities. No changes are proposed to that would alter recreational amenities citywide. As no specific project or improvement is currently proposed, a site-specific impact cannot be analyzed. The individual impacts to parks and recreation will be assessed at the time of specific project review. There are no new impacts to public services beyond what has been previously analyzed. Thus, the Housing Element would have less than significant impacts to parkland and recreational facilities.

**XVI.TRANSPORTATION AND CIRCULATION**

| Would the project:  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Result in inadequate emergency access?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Sources: 1, 2, 3, 4, 5, 6 and 7

**Transportation and Circulation Impacts Discussion:**

a) – b) **Less than Significant Impact.** No amendments are proposed as part of the Housing Element Update that would conflict with policies established for the performance of transportation and circulation, including a congestion management plan. The proposed Housing Element update does not change any adopted land use designation or densities including individual properties and sites. There are no changes proposed as part of the update that would result in elevated traffic trip generation beyond what was previously analyzed in the adopted General Plan.

There are no physical improvements proposed as part of the Housing Element Update. The traffic impacts of any future development will be addressed in separate site-specific studies. The proposed Housing Element Update does not introduce any new or more severe impacts relative to what was previously analyzed in the General Plan EIR. Therefore, implementation

of the proposed Housing Element updated would have less than significant impact to transportation and circulation.

- c) **Less than Significant Impact.** There are no changes to land uses that would affect air traffic patterns or introduce a safety risk. Given the location of future residential development within established neighborhoods and land uses identified for residential or mixed-use development, the Housing Element update will not have substantial impacts on air traffic patterns. Therefore, impacts would be less than significant.
  
- d) – e) **Less than Significant Impact.** No amendments are proposed to the San Rafael General Plan 2020 Circulation Element that substantially increase hazards or result in inadequate emergency access. There are no physical changes proposed as part of the subject Housing Element Update. Potential impacts of any future development will be reviewed at the project level when specific site details are further defined. At the policy level there are no new impact or more severe impacts that would result from implementation of the Housing Element Update. Therefore, impacts due to a design hazard or inadequate emergency access would be less than significant.
  
- f) **Less than Significant Impact.** There are no changes proposed that would conflict with the General Plan 2020 or the San Rafael Bicycle and Pedestrian Master Plan including the performance and safety of alternative transportation facilities. Potential impacts of any future development will be reviewed at the project level when specific site details are defined. The proposed Housing Element Update does not introduce any new or more severe impacts relative to what was previously analyzed in the General Plan EIR. Therefore, impacts due to a design hazard or inadequate emergency access would be less than significant.

**XVII.UTILITIES AND SERVICE SYSTEMS**

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

Sources: 1, 2, 3, and 7

**Utilities and Service Systems Impacts Discussion:**

- a) **Less than Significant Impact.** There are no activities proposed as part of the Housing Element Update that would exceed wastewater requirements. Potential water quality impacts were previously evaluated as part of the full residential buildout analyzed in the General Plan EIR. The proposed Housing Element Update does not introduce any new or more severe impacts to water quality relative to what was previously analyzed in the General Plan EIR. Therefore, implementation of the proposed Housing Element updated would have less than significant impact on water quality.
  
- b) **Less than Significant Impact.** There are no changes to land uses that would alter the water or wastewater demands evaluated in the General Plan EIR. No expansion of capacity or new facilities would result from implementing the proposed Housing Element Update. Therefore impacts to water and wastewater capacity would be less than significant.

- c) **Less than Significant Impact.** The proposed Housing Element Update will not result in any physical improvements necessitating the construction or expansion of stormwater drainage facilities. There are no new impacts or more severe impacts due to stormwater relative to what was analyzed under the General Plan EIR. Therefore impacts would be less than significant.
- d) – e) **Less than Significant Impact.** There are no changes to land uses, policies or programs as part of the Housing Element Update that would alter water supply resources or require additional wastewater treatment capacity. The General Plan EIR evaluated water supply demand and wastewater treatment capacity and there are no new or more severe impacts relative to what was analyzed therein. Therefore impacts to water supplies and waste treatment capacity would be less than significant.
- f) – g) **Less than Significant Impact.** The Housing Element Update will not generate solid waste or conflict with solid waste disposal regulation as no physical development will occur. The proposed Update provides for housing opportunities consistent with intensities and densities previously analyzed in the General Plan EIR. The Housing Element Update would not increase demand for solid waste or landfill disposal beyond what has previously been identified. Therefore, impacts due to solid waste disposal would be less than significant.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE (CAL. PUB. RES. CODE §15065)**

A focused or full environmental impact report for a project may be required where the project has a significant effect on the environment in any of the following conditions:

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

Sources: 1, 2, 3, 4, 5, 6 and 7

(a) **Less than Significant Impact.** The Housing Element Update is consistent with the General Plan and analysis conducted as part of the EIR. The proposed policies and programs do not conflict with the adopted General Plan Land Use and goals, policies and programs. As such, the Housing Element Update will not degrade the quality of the environment, reduce habitat, or affect cultural resources. Therefore, the project will have less than significant impacts due to degradation of the environment.

(b) **Less than Significant Impact.** The Housing Element Update is consistent with the City's General Plan land use designations and does not result in any changes to land use or zoning. The proposed policies and programs promote infill development on underutilized lots and increased density proximate to public transit, which is intended to reduce cumulative impacts associated with buildout of the General Plan. The General Plan EIR previously analyzed potential environmental impacts and no new or more severe cumulative impacts would result from the Housing Element Update. Therefore, the proposed Housing Element Update would result in less than significant cumulative impacts.

(c) **Less than Significant Impact.** The General Plan EIR identified policies, program and mitigation measure to ensure protection that implementation would not result in adverse impacts to humans or the environment. The Housing Element Updated does not conflict with adopted policies nor does it introduce new policies that would interfere with the goal of protecting human health and the environment. Therefore, the Housing Element Update will have less than significant impacts due to substantial adverse environmental effects.

## **F. SOURCE REFERENCES**

1. City of San Rafael General Plan 2020, adopted November 15, 2004; as amended through September 2014.
2. San Rafael General Plan 2020, Environmental Impact Report, prepared by Nichols Berman Environmental Planning, August 2004.
3. City of San Rafael Municipal Code.
  - a. Title 14: Zoning, adopted September 1994, as amended May 1996
  - b. Title 8, Chapter 8.13: Noise, adopted 2002
  - c. Title 15: Subdivisions, adopted 2002, as amended 2009
4. San Rafael Climate Change Action Plan, adopted 2009; Implementation Program Update May 2011.
5. City of San Rafael Bicycle/Pedestrian Master Plan, 2011 Update; adopted 2011
6. FHA's Non-Motorized Transportation Pilot Program (NTPP); 2009
7. Draft Housing Element Update 2014-2022 prepared by Metropolitan Planning Group, August 2014.

## **G. PUBLIC REVIEW:**

Pursuant to the CEQA Guidelines [§15164(c)], this addendum to the 2020 General Plan EIR does not need to be circulated for public review, and shall be included in, or attached to, the adopted and amended EIR.

Reviewed By: Paul A. Jensen