

4. Environmental Analysis

This chapter describes the organization of the environmental analysis section of this Draft EIR and the assumptions and methodology of the impact analysis and the cumulative impact setting.

CHAPTER ORGANIZATION

This chapter of the Draft EIR is made up of 18 subchapters that evaluate the direct, indirect, and cumulative environmental impacts of the proposed project. In accordance with Appendix F, Energy Conservation, and Appendix G, Environmental Checklist, of the CEQA Guidelines, the potential environmental effects of the proposed project are analyzed for potential significant impacts in the following 18 environmental issue areas, which are organized with the listed abbreviations:

4.1	Aesthetics (AES)	4.10	Hydrology and Water Quality (HYD)
4.2	Agriculture and Forestry Resources (AGF)	4.11	Land Use (LU)
4.3	Air Quality (AIR)	4.12	Mineral Resources (MIN)
4.4	Biological Resources (BIO)	4.13	Noise (NOISE)
4.5	Cultural and Tribal Resources (CULT)	4.14	Population and Housing (POP)
4.6	Energy (ENE)	4.15	Public Services and Recreation (PS)
4.7	Geology and Soils (GEO)	4.16	Transportation (TRANS)
4.8	Greenhouse Gas Emissions (GHG)	4.17	Utilities and Service Systems (UTIL)
4.9	Hazards and Hazardous Materials (HAZ)	4.18	Wildfire (FIRE)

Each subchapter is organized into the following sections:

- **Environmental Setting** offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared, and an overview of federal, State, regional, and local laws and regulations relevant to each environmental issue.
- **Standards of Significance** refer to the quantitative or qualitative standards, performance levels, or criteria used to evaluate the existing setting with and without the proposed project to determine whether the impact is significant. These thresholds are based primarily on the CEQA Guidelines, and also may reflect established health standards, ecological tolerance standards, public service capacity standards, or guidelines established by agencies or experts.
- **Impact Discussion** gives an overview of the potential impacts of the proposed project and explains why impacts are found to be significant or less than significant prior to mitigation. As appropriate, impacts are first addressed for General Plan 2040 and then for the Downtown Precise Plan, clearly denoted with separate headings. This subsection also includes a discussion of cumulative impacts related to the proposed project. Impacts and mitigation measures are numbered consecutively within each topical analysis and begin with an acronym or abbreviated reference to the impact section.

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STANDARDS OF SIGNIFICANCE

As stated above, significance criteria are identified before the impact discussion subsection, under the subsection, “Standards of Significance.” For each impact identified, a level of significance is determined using the following classifications:

- **Significant (S).** A significant impact includes a description of the circumstances where an established or defined threshold would be exceeded.
- **Less Than Significant (LTS).** A less-than-significant impact includes effects that are noticeable, but do not exceed established or defined thresholds, or can be mitigated below such thresholds.
- **No Impact.** A no impact conclusion describes circumstances where there is no adverse effect on the environment.
- **Significant and Unavoidable (SU).** For each impact identified as being significant, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measure(s) would reduce the impact to a less-than-significant level successfully, this is stated in the EIR. Significant and unavoidable impacts are described where mitigation measures would not diminish these effects to less-than-significant levels. The identification of a program-level significant and unavoidable impact does not preclude the finding of less-than-significant impacts for subsequent projects that comply with the applicable regulations and meet applicable thresholds of significance.

EVALUATION METHODOLOGY

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the City of San Rafael, acting as the lead agency, based on substantial evidence in the record as a whole, including views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on the setting. The analysis in the Draft EIR is based on scientific and factual data that has been reviewed by the lead agency and represents the lead agency’s independent judgment and conclusions.¹ This section describes the methodology for the program-level evaluation in Chapters 4.1 through 4.18 with respect to the horizon year, the baseline, the application of the proposed General Plan 2040 policies and Downtown Code, potential future projects in a priority development area (PDA) or a transit priority area (TPA), parking impacts, effects of the environment on the project, and cumulative impacts.

2040 HORIZON DEVELOPMENT POTENTIAL

As discussed in Chapter 3, Project Description, of the Draft EIR, the proposed project includes two long-range planning documents; 1) General Plan 2040 and 2) The Downtown San Rafael Precise Plan. The environmental analysis in this EIR discusses the potential for adverse impacts to occur from extending the buildout potential in the EIR Study Area to horizon year 2040; increasing the buildout potential in the EIR Study Area; General Plan land use designation changes; new and modified General Plan goals, policies,

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15064(b).

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and programs; and new Zoning designations and Downtown Code regulations in the Downtown Precise Plan Area.

The 2040 horizon development potential under the proposed project includes the net increase of maximum development potential for the Downtown Precise Plan Area, plus the development potential for the remainder of the city. As shown in Tables 3-6 and 3-7 in Chapter 3, Project Description, of this Draft EIR, this combined projected new growth in the entire EIR Study Area for the 2040 horizon year includes 4,250 new households, 4,460 new residential units, 8,910 new residents, and 4,155 new employees by 2040. Of these, up to 2,100 new households, 2,200 new residential units, 3,570 new residents, and 2,020 new employees would be within the Downtown Precise Plan Area.

Because the proposed project consists of two long-term policy documents that are intended to guide future development activities and City actions, and because no specific development projects are proposed as part of the project, it is reasonable to assume that future development would occur incrementally or gradually over the 20-year buildout horizon (e.g., 2020 to 2040). However, while this assumption describes the long-range nature of the proposed project, it does not prohibit or restrict when development can occur over the horizon period.

BASELINE

As discussed in Chapter 3, Project Description, of this Draft EIR, although many of the goals, policies, and programs of the existing General Plan are being affirmed and incorporated into the proposed project, this EIR does not evaluate the proposed project compared to the full potential buildout allowed by the existing General Plan, but rather evaluates the impacts of the proposed project compared to existing conditions, as required by CEQA Guidelines Section 15126.2. As shown in Table 4-1, the baseline represents the existing conditions on the ground (“physical conditions”), as described in Table 3-6 and Table 3-7 in Chapter 3, Project Description.

TABLE 4-1 EXISTING BASELINE CONDITIONS

Category	Downtown Precise Plan Area	Remainder of the EIR Study Area	Total EIR Study Area
Households	1,496	26,636	28,132
Residential Units	1,571	27,958	29,529
Total Population	2,315	73,436	75,751
Employees	11,000	33,200	44,200

Note: As described in Chapter 3, Project Description, of this Draft EIR, the EIR Study Area includes the planning area, sphere of influence, and the city limits. The EIR Study Area is shown on Figure 3-2.

Source: City of San Rafael, 2020.

GENERAL PLAN 2040 POLICIES AND DOWNTOWN CODE

As discussed in Chapter 3, Project Description, a comprehensive list of goals, policies, and programs is provided in Appendix B, Proposed General Plan Goals, Policies, and Programs, of this Draft EIR. The proposed goals, policies, and programs aim to reduce vehicle miles traveled, greenhouse gas emissions, air and water pollutants, energy consumption, water demand, and solid waste generation by promoting

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infill development; increase opportunities for alternative modes of transportation, pedestrian and bicycle access and connectivity, and local jobs; protect open space; conserve natural resources; and require adherence to green building practices. General Plan policies aim to avoid hazardous conditions and facilitate a healthy and safe environment for residents and visitors to San Rafael. In addition, General Plan policies aim to protect cultural resources, including historic buildings, and ensure new development and redevelopment is compatible with neighboring land uses. While the proposed policies and programs in Appendix B aim to reduce environmental impact, the EIR process provided an additional opportunity to modify the policies and programs to ensure they adequately reduce impacts from potential future projects in San Rafael.

Additionally, the proposed Downtown Code, which would replace existing zoning regulations for all of the properties in the Downtown Precise Plan Area with the exception of a few parcels in the Latham Street area, which would retain their Multifamily Residential District ([Medium Density] 2,500 square feet per dwelling unit [MR2.5]) zoning designation, and the existing open space zoning designations. The changes to General Plan 2020 goals, policies, and programs include both substantive and nonsubstantive changes, while the Downtown Code would consist of new zoning regulations for the Downtown Precise Plan Area.

Substantive General Plan policy and program changes include addition, removal, or functional revisions (i.e., not purely semantic) in ways that have the potential to result in a physical impact on the environment. Discussions of how substantive policy changes and the new Downtown Code may result in adverse physical changes are included in the analyses under each impact criterion in the Impact Discussion section in Chapters 4.1 through 4.18 of the Draft EIR. Amended and new policies collectively reflect the changes to the current General Plan 2020. The proposed goals, policies, and programs have been carefully reviewed for their adequacy in reducing and/or avoiding impacts to the environment that could occur from future development in the city. The proposed General Plan goals, policies, and programs are listed in the impact discussions of Chapters 4.1 through 4.18 to illustrate where they would reduce impacts from potential future development in San Rafael.

The content of the General Plan 2040 policies and the Downtown Code is directly integrated with and reflective of the proposed project as a whole. Therefore, impact discussions for the effects of the proposed project necessarily encompass analysis of the effects of these policies and the Downtown Code as a whole, and policies and code sections with relevance to CEQA topics are discussed in the appropriate chapters. Nonsubstantive changes include the renumbering of policies or minor text revisions, which do not have the potential to result in a physical change to the environment.

PRIORITY DEVELOPMENT AREAS AND TRANSIT PRIORITY AREAS

The Metropolitan Transportation Commission's and Association of Bay Area Governments' (ABAG) *Plan Bay Area* is the San Francisco Bay Area's Regional Transportation Plan/Sustainable Community Strategy. *Plan Bay Area* is the long-range integrated transportation and land use/housing strategy through 2040 for the Bay Area, pursuant to Senate Bill 375 (SB 375), the Sustainable Communities and Climate Protection Act. *Plan Bay Area* lays out a development scenario for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce greenhouse gas (GHG) emissions from transportation vehicle miles traveled (VMT) (excluding goods movement) beyond the per capita reduction targets identified by the California Air Resources Board. *Plan Bay Area 2040* is a

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limited and focused update to the *Plan Bay Area* 2013, with updated planning assumptions that incorporate key economic, demographic, and financial trends from the last several years.² The existing *Plan Bay Area* 2040 is currently being updated to extend the planning horizon to 2050.³

As part of the implementing framework for *Plan Bay Area*, PDAs and TPAs are identified as areas where concentrated development can have beneficial environmental effects and reduce adverse environmental impacts. As shown on Figure 4-1, the EIR Study Area has the following three PDAs and three TPAs:

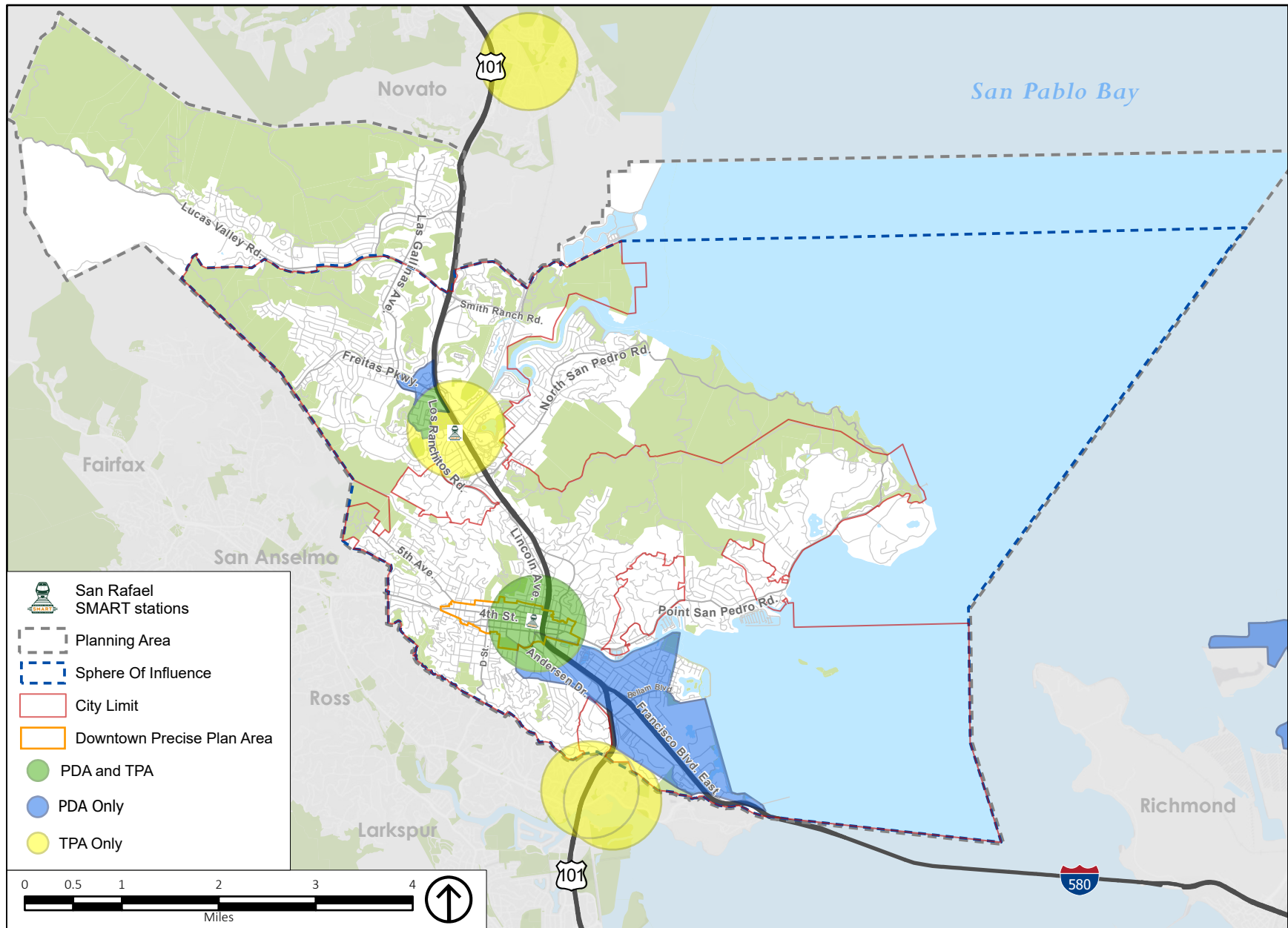
- **North San Rafael PDA.** This is the northernmost PDA in the Terra Linda neighborhood. This PDA includes the Northgate Mall, Northgate I Centre, Northgate III, and the Las Gallinas office and gas station areas. As shown on Figure 4-2, this PDA overlaps with the Civic Center Smart Station TPA.
- **Civic Center Smart Station TPA.** This TPA, also shown on Figure 4-2, is in northern San Rafael and encompasses the 0.5-mile radius surrounding the Marin Civic Center SMART Station. This TPA overlaps with the North San Rafael PDA.
- **Southeast San Rafael / Canal PDA.** This is the southernmost PDA in San Rafael and includes the southeast part of the city, including the Canal neighborhood. As shown on Figure 4-3, this PDA shares a border with the Downtown San Rafael SMART Station PDA and TPA and the Larkspur TPA.
- **Downtown San Rafael SMART Station PDA and TPA.** As shown on Figure 4-4, the Downtown San Rafael SMART Station PDA and TPA is partially located in the Downtown Precise Plan Area. This PDA/TPA includes 503 acres surrounding the San Rafael Transit Center. About 200 acres of the Downtown Precise Plan Area is within 0.25 miles, or within a 10-minute walking distance, of the San Rafael Transit Center. This PDA/TPA is a designated “City Center PDA,” which is defined as a subregional center of economic and cultural activity served by frequent, dedicated regional transit with connections to frequent subregional and local service. Objectives of City Center PDAs, in conjunction with TPAs, are to reduce GHG emissions, improve public health, alleviate the housing crisis, and facilitate economic development through coordinated land use and transportation planning. ABAG indicates that this PDA is expected to absorb about 40 percent of the city’s household growth in the next 20 years, although General Plan 2040 is anticipating an even higher capture rate.⁴
- **Larkspur TPA.** A very small portion of this TPA that surrounds the Larkspur SMART Station is in the southern boundary of the San Rafael city limits. See Figure 4-1.

² Metropolitan Transportation Commission and Association of Bay Area Governments, 2017, *Plan Bay Area 2040 Final*, <http://2040.planbayarea.org/>, accessed on March 12, 2019.

³ To read more about *Plan Bay Area*, go to www.planbayarea.org.

⁴ Metropolitan Transportation Commission and Association of Bay Area Governments, 2017, *Plan Bay Area 2040 Plan*.

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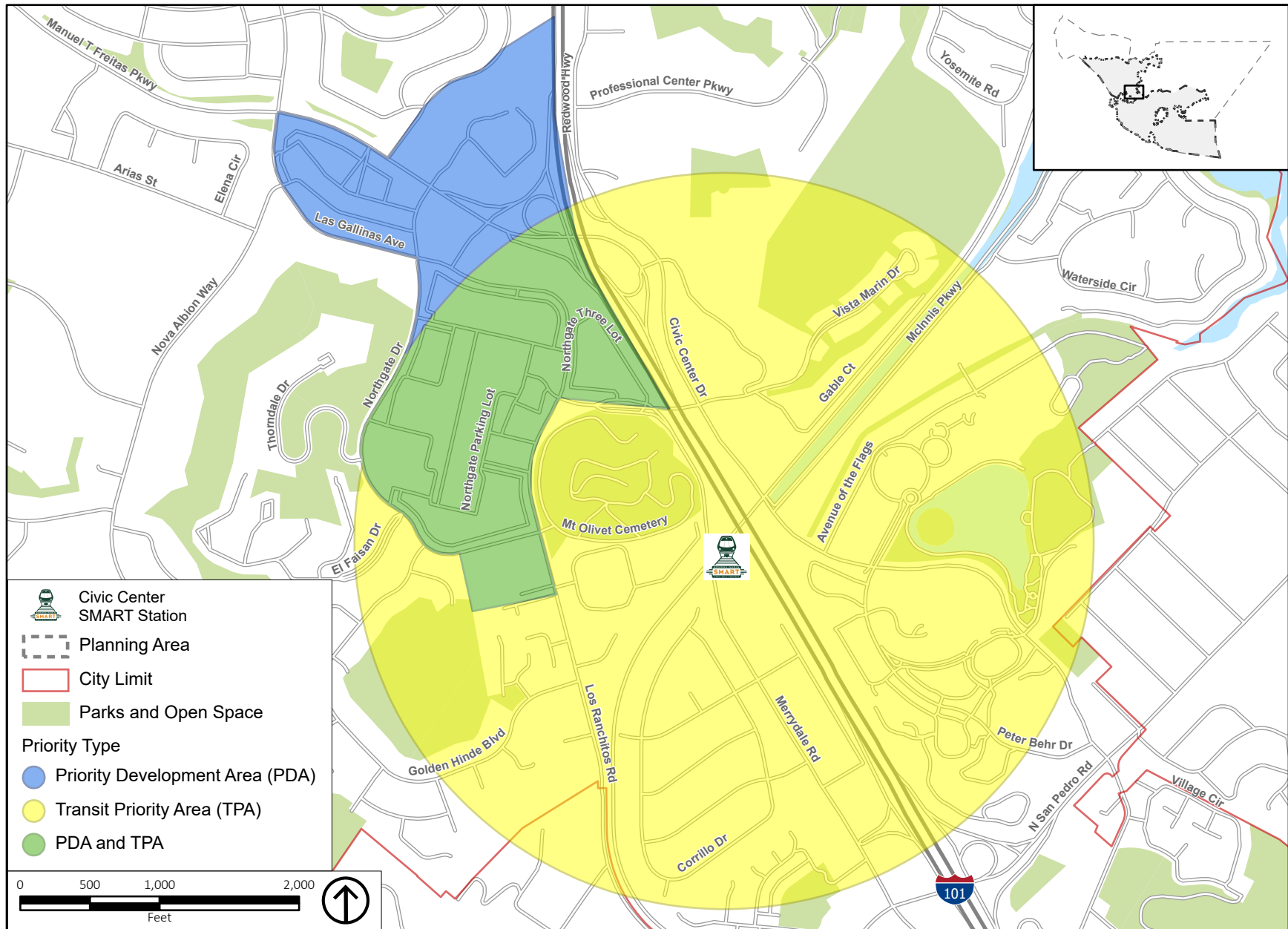


Source: ABAG/MTC, 2017; ESRI, 2017; County of Marin, 2009; City of San Rafael, 2019; PlaceWorks, 2019.

Figure 4-1

Priority Development Area and Transit Priority Areas

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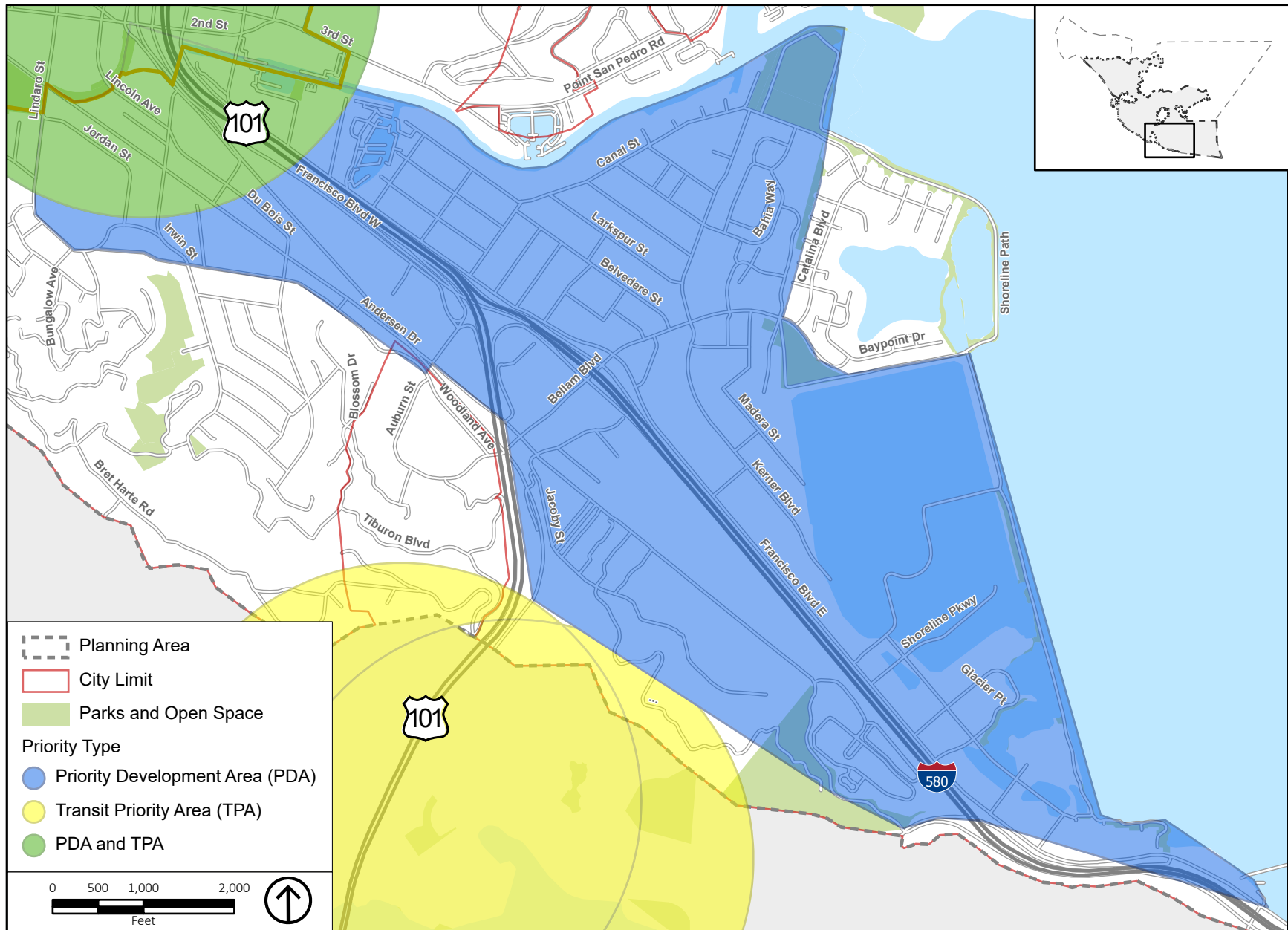


Source: ABAG/MTC, 2017; ESRI, 2017; County of Marin, 2009; City of San Rafael, 2019; PlaceWorks, 2019.

Figure 4-2

North San Rafael PDA and San Rafael Civic Center SMART Station TPA

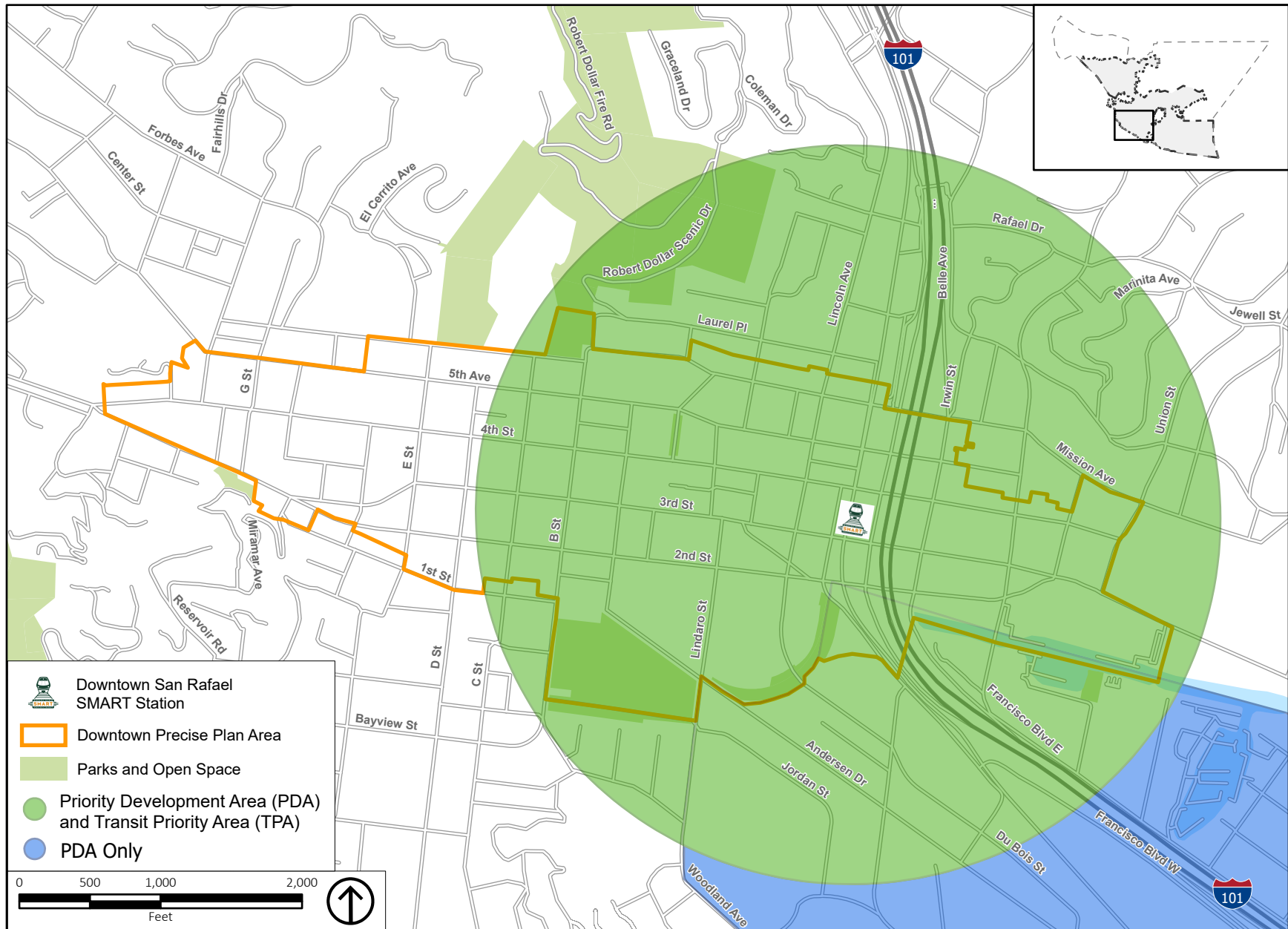
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Source: ABAG/MTC, 2017; ESRI, 2017; County of Marin, 2009; City of San Rafael, 2019; PlaceWorks, 2019.

Figure 4-3
Southeast San Rafael / Canal PDA

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Source: ABAG/MTC, 2017; ESRI, 2017; County of Marin, 2009; City of San Rafael, 2019; PlaceWorks, 2019.

Figure 4-4
Downtown San Rafael SMART Station PDA and TPA

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PRIORITY DEVELOPMENT AREAS

A PDA is a place that has convenient public transit service, often referred to as “transit-oriented,” that is prioritized by local governments, such as San Rafael, for housing, jobs, and services within existing communities. A PDA is a funding and planning tool. If a local jurisdiction voluntarily nominates an area for PDA designation, the designation provides the local jurisdiction with access to funds and grants to develop and adopt area plans to plan for, design, and regulate future growth of the area; and constructed needed and/or planned infrastructure improvements.⁵ PDAs are voluntarily nominated by the local jurisdiction. Further, the local jurisdiction has the full discretion to set the boundaries of the PDA within the eligible PDA areas that have been identified by *Plan Bay Area*. Overall, well over two-thirds of all regional growth in the San Francisco Bay Area by 2040 is projected to occur in PDAs. The PDAs identified in *Plan Bay Area* 2040 were projected to accommodate 80 percent (or over 525,570 units) of new housing and 66 percent (or 744,230) of new jobs in the region. Development in PDAs leverage existing infrastructure and therefore can minimize development in green field (undeveloped) areas and maximize growth in transit-rich communities to help lower VMT and consequently reduce GHG emissions, air quality pollutants, and noise from vehicles with internal combustion engines dependent on fossil fuels. Additionally, due to the location, infill development in PDAs result in fewer impacts related to agricultural, forestry, mineral, archaeological, and biological resources, energy, geology and soils, hydrology and water quality, and wildfire. Impacts related to concentrated development in the PDAs is discussed throughout this Draft EIR, and specific quantified impacts are described in Chapter 4.3, Air Quality, Chapter 4.8, Greenhouse Gas Emissions, and Chapter 4.16, Transportation, of this Draft EIR.

Certain potential future residential or mixed-use residential projects and projects in PDAs that meet defined criteria in the CEQA Guidelines may be eligible for CEQA streamlining. For example, while not exclusive to PDAs, due to their urban setting, development in a PDA is more likely to qualify for a CEQA Guidelines Section 15332, Infill Development Projects, Class 32 Categorical Exemption.

TRANSIT PRIORITY AREAS

In addition to PDAs, *Plan Bay Area* 2040 also identifies TPAs, which are areas within 0.5 miles of a major transit stop (i.e., a stop with service frequency of 15 minutes or less) that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon of a Transportation Improvement Program adopted pursuant to Section 450.216 or Section 450.322 of Title 23 of the Code of Federal Regulations. TPAs generally include existing neighborhoods served by transit and contain a wide range of housing options along with jobs, schools, and amenities. Certain potential future residential or mixed-use residential projects and projects⁶ in TPAs that meet defined criteria in the CEQA Guidelines may be eligible for CEQA streamlining.

With respect to potential future development in a TPA, Senate Bill (SB) 743, which became effective on January 1, 2014, amended CEQA by adding Public Resources Code Section 21099 regarding analysis of transportation, aesthetics, and parking impacts for urban infill projects, among other provisions.

⁵ City of San Rafael, Community Development, Planning Division, Priority Development Areas.
<https://www.cityofsanrafael.org/priority-development-areas-2020/>, Accessed December 29, 2020.

⁶ A project in a transit priority area is referred to as a transit priority project sometimes referred to as a TPP development.

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With respect to transportation impacts, SB 743 required the Governor's Office of Planning and Research to identify new metrics for identifying and mitigating transportation impacts under CEQA, shifting from a congestion-based (level of service or LOS) standard to a VMT standard. Transportation impacts are discussed in Chapter 4.16, Transportation, of this Draft EIR.

With respect to aesthetics and parking, CEQA Section 21099(d)(1), states, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a TPA shall not be considered significant impacts on the environment." Accordingly, these topics are no longer to be considered in determining significant environmental effects for projects that meet all three of the following criteria:

- Is located on an infill site which is defined as "a lot located within an urban area that has been previously developed or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses."
- Is a residential, mixed-use residential, or an employment-center project.
- Is in a transit priority area, which is defined as "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or Section 450.322 of Title 23 of the Code of Federal Regulations."

Accordingly, in compliance with SB 743, no significant aesthetic or parking impacts can be made in this environmental analysis for potential future development in the Civic Center Smart Station TPA and the Downtown San Rafael SMART Station TPA, which is also a PDA as shown on Figure 4-4. Aesthetic and parking impacts are not discussed further in this EIR with respect to potential future development in these designated TPAs. As appropriate, aesthetic impacts are considered for potential future development outside of these areas.

PARKING

Effective in 2010, parking inadequacy as a significant environmental impact was eliminated from the CEQA Guidelines by The Governor's Office of Planning and Research, which is the entity charged with drafting guidelines to help agencies implement CEQA. Accordingly, parking adequacy in the EIR Study Area is not discussed further in this EIR.

POTENTIAL EFFECTS OF THE PROJECT ON THE ENVIRONMENT

The California Supreme Court concluded in the *California Building Industry Association vs. Bay Area Air Quality Management District* (CBIA vs. BAAQMD) case that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents." The CBIA vs. BAAQMD ruling provided for several exceptions to the general rule where an analysis of the project on the environment is warranted: 1) if the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried); 2) if the project qualifies for certain specific specified exemptions (certain housing projects and transportation priority projects per Public Resource Code (PRC)

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21159.21 (f),(h); 21159.22 (a),(b)(3); 21159.23 (a)(2)(A); 21159.24 (a)(1),(3); or 21155.1 (a)(4),(6)); 3) if the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (per PRC 21096); and 4) school projects require specific assessment of certain environmental hazards (per PRC 21151.8). Therefore, the evaluation of the significance of project impacts under CEQA focuses on the potential impacts of the proposed project on the environment, including whether the proposed project may exacerbate any existing environmental hazards. Existing environmental hazards in San Rafael include, but are not limited to, seismic hazards, sea level rise, and wildfire. Therefore, while the effects of these hazards on the proposed project are not subject to CEQA review following the *CBIA* case,⁷ the City recognizes that seismic, wildfire, and flooding hazards from sea level rise are issues of local concern. Therefore, a discussion of the project's potential to exacerbate these hazardous conditions, is provided in Chapter 4.7, Geology and Soils, Chapter 4.9, Hazards and Hazardous Materials, and Chapter 4.10, Hydrology and Water Quality, of this Draft EIR.

CUMULATIVE IMPACT ANALYSIS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other reasonably foreseeable projects causing related impacts. Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Used in this context, cumulatively considerable means that the incremental effects of an individual 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. In the case of a long-range plan such as the General Plan and the Downtown Precise Plan, cumulative effects occur when future development under the long-range plan is combined with development in the surrounding areas, or in some instances, in the entire region.

Where the incremental effect of a project is not "cumulatively considerable," a lead agency need not consider that effect significant but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. The CEQA Guidelines state that a lead agency has discretion to determine if a project's contribution to a significant cumulative impact is cumulatively considerable.

The cumulative discussions in Chapters 4.1 through 4.18 of this Draft EIR explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, county, watershed, or air basin). The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing macro-scale air quality impacts, all development within the air basin contributes to regional emissions of criteria pollutants, and basinwide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, on the other hand, only development within the local area of change would contribute to a cumulative visual effect since the area of change is only visible in its vicinity.

⁷ *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369.

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CEQA Guidelines Section 15130 permits two different methodologies for the cumulative impact analysis:

- The “list” approach permits the use of a list of past, present, and probable future projects producing related or cumulative impacts, including projects both within and outside the city.
- The “projections” approach allows the use of a summary of projections in an adopted plan or related planning document, such as a regional transportation plan, or in an EIR prepared for such a plan. The projections may be supplemented with additional information such as regional modeling.

The cumulative impact analysis in this Draft EIR relies on a projections approach and takes into account growth from the proposed project within the EIR Study in combination with impacts from projected growth in the rest of Marin County and the surrounding region, as forecast by *Plan Bay Area 2040*. The following provides a summary of the cumulative impact setting for each impact area:

- **Aesthetics:** The cumulative setting for visual impacts includes potential future development under the proposed project combined with effects of development on lands adjacent to the city in Novato to the north, San Anselmo and Ross to the west, and Larkspur and the unincorporated Marin County communities to the south.
- **Agricultural and Forestry Resources:** The geographic scope of the cumulative analysis for agricultural and forestry resources considers those agriculture and forestry resources deemed to be resources of Statewide importance in the surrounding incorporated and unincorporated lands, the region, and the state.
- **Air Quality:** Cumulative air quality impacts could occur from a combination of the proposed project with regional growth within the San Francisco Bay Area Air Basin.
- **Biological Resources:** The geographic scope of the cumulative analysis for biological resources considers the surrounding incorporated and unincorporated lands and the region.
- **Cultural and Tribal Resources:** Cumulative impacts to cultural resources could occur from projected growth in the surrounding region.
- **Energy:** Cumulative impacts to energy resources could occur from the estimated growth in the energy provider’s service area.
- **Geology and Soils:** Potential cumulative geological impacts could arise from future growth in the immediate vicinity of the adjoining jurisdictions.
- **Greenhouse Gas Emissions:** The cumulative impact analyses for greenhouse gas (GHG) emissions are related to the entire region. Because GHG emissions are not confined to a particular air basin but are dispersed worldwide, the cumulative impact analysis focuses on the global impacts and thus, is by its nature cumulative.
- **Hazards and Hazardous Materials:** The cumulative analysis considers the effects growth in the rest of Marin County and surrounding region.
- **Hydrology and Water Quality:** The geographic context used for the cumulative assessment of hydrology and water quality impacts, including the potential to exacerbate the potential for flooding, considers the watersheds that encompass San Rafael.

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- **Land Use and Planning:** The geographic context for the cumulative land use and planning effects considers impacts from projected growth in the rest of Marin County and the surrounding region, as forecast in *Plan Bay Area 2040*.
- **Mineral Resources:** The geographic scope of the cumulative analysis for mineral resources considers the potential loss of a known regionally or locally significant mineral resource in the surrounding incorporated and unincorporated lands, the region, and the State.
- **Noise:** The traffic noise levels are based on cumulative traffic conditions that take into account cumulative development in the region.
- **Population and Housing:** Impacts from cumulative growth are considered in the context of their consistency with regional planning efforts.
- **Public Services and Recreation:** Cumulative impacts are considered in the context of projected growth in the rest of Marin County and the surrounding region, as forecast by *Plan Bay Area 2040*, and contiguous with the service area boundaries of the service providers evaluated in this section.
- **Transportation:** The analysis of the proposed project addresses cumulative impacts to the transportation network in the surrounding area.
- **Utilities and Service Systems:** Cumulative impacts are considered in the context of the estimated growth in each utility's service area.
- **Wildfire:** The analysis of the proposed project includes a discussion of how cumulative development in the region may exacerbate wildfire risk in San Rafael and the surrounding area.