LOS GAMOS MEDICAL OFFICE BUILDING
CEQA REVIEW

HYDROLOGY & WATER QUALITY

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The following descriptions were prepared by BKF Engineers with assistance from Kaiser NFS for purposes of evaluating potential environmental impacts to Hydrology & Water Quality associated with the proposed project.

HYDROLOGY & WATER QUALITY

Existing Conditions

The site consists of two parcels totaling approximately 11.1 acres separated by a public roadway (City of San Rafael, Los Gamos Drive), in addition to 42 parking existing parking spaces located on the adjacent property at 1600 Los Gamos Drive. The 4.1-acre eastern parcel is fully developed with an office building, surface parking lots, and planter areas. The 7.0-acre western parcel is partially developed with surface parking lots and planter areas. The undeveloped areas of this parcel include hillsides with slopes up to 50% which are covered with trees and ground cover. The project proposes to construct an up to 511-space parking structure on the western parcel, amend the zoning to allow medical office within the existing building on the eastern parcel, and continue to use the 42 parking spaces at 1600 Los Gamos Drive for parking ("Project").

The development of these parcels preceded current stormwater treatment requirements. Drainage runoff is collected in area inlets and pipes and directly discharged to the City of San Rafael storm drainage system.

a) Would the project violate any water quality standards or waste discharge requirements?

Less than significant impact with mitigation incorporated. Development activities associated with the proposed project could result in the discharge of pollutants and could impact the quality of receiving waters during construction activities and during the operational phase. Each phase is discussed separately on the pages that follow.

Construction Activities

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

Grading and the exposure of shallow soils related to grading could result in erosion and sedimentation. The accumulation of sediment could result in the blockage of flows, potentially causing increased localized ponding or flooding. Construction activities would require the use of gasoline and diesel-powered heavy equipment, such as bulldozers, backhoes, water pumps, and air compressors. Chemicals such as gasoline, diesel fuel, lubricating oil, hydraulic oil, lubricating grease, automatic transmission fluid, paints, solvents, glues, and other substances could be used during construction. An accidental release of any of these substances could degrade the quality of the surface water runoff and adversely affect receiving waters.

Prior to grading activities, Kaiser shall prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated; (3) site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs installed to reduce or eliminate pollutants after construction are completed.

The SWPPP shall be prepared by a Qualified SWPPP Developer (QSD). The SWPPP shall include the minimum BMPs required for the identified risk level. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site Best Management Practices (BMPs) Manual.

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

Operational Phase

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

Prior to a certificate of occupancy, Kaiser shall verify that operational stormwater quality control measures that comply with the requirements of the current Phase II Small MS4 Permit have been implemented. Responsibilities include but are not limited to designing BMPs into project features and operations to reduce potential impacts to surface water quality and to manage changes in the timing and quantity of runoff associated with operation of the project. These features shall be included in the design-level drainage plan and final development drawings.

The proposed project shall incorporate site design measures and Low Impact Development design standards, including minimizing disturbed areas and impervious surfaces, infiltration, harvesting, evapotranspiration, and/or bio-treatment of stormwater runoff.

Kaiser shall establish an Operation and Maintenance Plan. This plan shall specify a regular inspection schedule of stormwater treatment facilities in accordance with the requirements of the Phase II Small MS4 Permit. Funding for long-term maintenance of all BMPs shall be specified.

b) Would the project 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)?

Less than significant impact. The project is located within the Marin Municipal Water District (MMWD) and would utilize domestic water provided by the MMWD. According to the MMWD's 2015 Urban Water Management Plan, "groundwater is not currently or planned to be used as a municipal water supply source by the district, though private groundwater wells are used in the district's service area" (page 6-3). As a result, the proposed project would not substantially deplete groundwater supplies.

Since the new parking structure will displace the existing surface parking lot, there will be no net increase in the amount of impervious surface area. Similarly, improvements to the off-site roadways and existing surface parking lots around the office building will not increase impervious surface areas. As such, the proposed project would not interfere substantially with ground water recharge.

c) Would the project substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less than significant impact with mitigation incorporated. Development of the proposed project would include construction activities that would expose soils and could potentially result in substantial erosion. As discussed previously, the State Water Resources Control Board adopted a NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). To obtain coverage under the Construction General Permit, a project applicant must submit various documents, including a Notice of Intent and a SWPPP. Activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground, such as grubbing or excavation.

The purpose of the SWPPP is to identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges and to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges resulting from construction activity.

Since the new parking structure will displace an existing surface parking lot, there will be no net increase in the amount of impervious surface area. Similarly, improvements to the off-site roadways and existing surface parking lots around the office building will not significantly increase impervious surface areas. As such, the proposed project would not result in alterations of the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

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

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than significant impact. The project site contains existing storm drainage infrastructure consisting of catch basins and underground piping. The existing storm drainage infrastructure discharges runoff to connections with the City of San Rafael storm drainage system. This existing infrastructure would be repurposed to serve the parking structure. Since the new parking structure will displace the existing surface parking lot, there will be no net increase in the amount of impervious surface area. Similarly, improvements to the off-site roadways and existing surface parking lots around the office building will

not increase impervious surface areas. As such, the proposed project would not result in increased downstream flow rates which would exceed the capacity of the stormwater drainage systems.

f) Would the project otherwise substantially degrade water quality?

Less than significant impact with mitigation incorporated. Development activities associated with the proposed project could result in the discharge of pollutants and could impact the quality of receiving waters during construction activities and during the operational phase. As discussed in Section a) above, the project will obtain coverage under the State's Construction General Permit and Phase II Small MS4 Permit. Compliance with these required permits would ensure that runoff during construction and operation of the project site does not substantially degrade water quality.

g) Would the project 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?

No impact. The proposed project consists of reuse of an existing office building and associated surrounding parking for medical office uses, and the development of a parking structure, a non-residential facility. This condition precludes the possibility of placement of housing within a 100-year flood hazard area.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Number 06041C0293E dated March 16, 2016, the site is located within Zone X, Areas of Minimal Flood Hazard. The proposed improvements are outside any area which would potentially impede or redirect 100-year flood flows.

i) Would the project 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?

No Impact. The City of San Rafael General Plan does not identify the project site to be within an area with a significant risk of failure of a levee or dam. Per Sections g) and h) above, the site is not within an area anticipated to be subject to significant flooding.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of inundation by seiche, tsunami, or mudflow?

No Impact. The City of San Rafael General Plan does not identify the project site to be within an area with a significant risk tsumani, as it is not located along the coast. In addition, there are no lakes, water towers or other water features that pose a rise of seiche near the building.