City of Sausalito

Recirculated Draft Environmental Impact Report for the Sausalito Amended 6th Cycle Housing Element

SCH # 2024070676

DECEMBER 2024

Recirculated Portions Include:

- Executive Summary – excerpted pages
- 3.1 Aesthetics – excerpted pages
- 3.3 Biological Resources – excerpted pages
- 3.14 Transportation and Circulation – entire section
- 4.0 Alternatives – entire chapter
- 5.0 Other CEQA Considerations – excerpted pages
- Appendix B1 – entire section

Added text is shown with double underlined text
Removed text is shown with ~~strikethrough~~ text

Prepared for:

City of Sausalito
420 Litho Street
Sausalito, CA 94965

Prepared by:

De Novo Planning Group
1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762

City of Sausalito

Recirculated Draft Environmental Impact Report for the Sausalito Amended 6th Cycle Housing Element

SCH #2024070676

DECEMBER 2024

Recirculated Portions Include:

- Executive Summary – excerpted pages
- 3.1 Aesthetics – excerpted pages
- 3.3 Biological Resources – excerpted pages
- 3.14 Transportation and Circulation – entire section
- 4.0 Alternatives – entire chapter
- 5.0 Other CEQA Considerations – excerpted pages
- Appendix B1 – entire section

Added text is shown with double underlined text
Removed text is shown with ~~strikethrough~~ text

Prepared for:

City of Sausalito
420 Litho Street
Sausalito, CA 94965

Prepared by:

De Novo Planning Group
1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762

RECIRCULATED DRAFT EIR

CHAPTER **PAGE NUMBER**

Executive Summary .....excerpts

3.1 Aesthetics .....excerpts

3.3 Biological Resources .....excerpts

3.14 Transportation and Circulation..... entire section: 3.14-1

4.0 Alternatives..... entire chapter: 4-1

5.0 Other CEQA-Required Topics ..... excerpt

Appendices

B1. Air Quality, Greenhouse Gas, and Energy Calculations – Alternative 5

Revisions to specified pages of the Executive Summary are identified below.

EXECUTIVE SUMMARY

Page ES-19, list of Project-Specific Significant and Unavoidable Effects is revised to read:

~~**Impact 3.15-2:** Sufficient water supplies may not be available to serve development facilitated by the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.~~

Page ES-20, list of Cumulative Significant and Unavoidable Effects is revised to read:

Impact 3.1-6: Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to aesthetics.

Impact 3.4-6: Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, ~~would not~~ could result in significant cumulative impacts with respect to historic, cultural, or tribal cultural resources.

Impact 3.15-6: Development facilitated by the Project, in combination with past, present, and reasonably foreseeable projects, ~~would not~~ could result in significant cumulative impacts with respect to water supply, wastewater, solid waste, and storm drain facilities (water supply).

Page ES-20 through ES-27, list of Cumulative Significant and Unavoidable Effects is revised to read:

SUMMARY OF ALTERNATIVES TO THE AMENDED HOUSING ELEMENT

Below is a summary of the alternatives to the Amended Housing Element project considered in Chapter 4, Alternatives.

ALTERNATIVE 1A – NO PROJECT/NO REZONING

CEQA Guidelines Section 15126.6(e) requires an EIR to evaluate a 'No Project Alternative,' which is defined as what would be reasonably expected to occur in the foreseeable future if the project were not approved. The No Project Alternative would allow the 6th Cycle Housing Element to remain in place and would not include the rezoning and Objective Design and Development Standards (ODDS) efforts, including the implementation of Programs 4, 8, and 19, that are being implemented in conjunction with the Amended Housing Element project. Development accommodated under Alternative 1a would be approximately 191 dwelling units on Housing Element sites with existing General Plan land use designations and zoning to accommodate residential development and approximately 187 accessory dwelling units and SB 9 units, resulting in limited progress toward implementing the City's Housing Element.

Alternative 1a would not rezone any parcels within the city to accommodate very low, low, moderate, or above moderate-income housing, as the rezoning would occur as a separate future action under the adopted 6th Cycle Housing Element. Zoning overlays would not be developed or implemented on parcels throughout the city to identify minimum residential and mixed-use densities. The City would not make publicly-owned sites available for development during the 2023-2031 Housing Element planning period, as described in Housing Element Policy 8. Further, Alternative 1a would not develop design standards, height limits, streamlined ministerial review, historic preservation, and historic design guidelines to support removing governmental constraints and making the sites identified by Program 4 available for development as envisioned by the Amended Housing Element.

Under Alternative 1a, sites anticipated for rezoning under the proposed Project would not be rezoned, including those sites subject to a vote of the electorate as set forth in Ordinance 1022 and Ordinance 1128. The City would not initiate or conduct an election to rezone specific sites identified as initiative-restricted, specifically Sites 39, 44, 47, 72, 79, 81, 84, 201, 211, 212, 301, 303, 306, 401, and 402, as identified in Appendix D1 of the Amended Housing Element.

This alternative would not result in the establishment of new zoning overlay designations, would not change the City's Zoning Code, and would not change the existing Zoning Map. Further, preparation of ODDS would not occur, and the City would continue to use the

General Plan policies and Zoning Code standards to direct and inform growth in the city. All sites identified as Opportunity Sites in this EIR would retain their existing zoning designations and would be anticipated to build out using the same zoning designations as currently exist, and at the maximum densities allowable, consistent with the General Plan.

All sites identified as Inventory Sites, Opportunity Sites, and sites that have approved but not yet constructed units would be developed according to their existing zoning or approved plans, respectively. As a result, approximately 378 units would be constructed, which would be 769 units less than those proposed under the Amended Housing Element project.

However, if the City does not complete rezoning to comply with Housing Element Program 4 and Government Code Section 65583(c)(1)(A) by Jan. 1, 2026 the City will be out of compliance with state housing element law, and the "Builder's Remedy" under Government Code Section 65589.5 et seq., as amended by AB 1893 will apply to the City, potentially allowing greater development than is presently allowed or that is contemplated by the Project or Alternative 1a.

ALTERNATIVE 1B – NO PROJECT/ADOPTED HOUSING ELEMENT IMPLEMENTATION

CEQA Guidelines Section 15126.6(e) requires an EIR to evaluate a 'No Project Alternative,' which is defined as what would be reasonably expected to occur in the foreseeable future if the project were not approved. Alternative 1b would allow the adopted 6th Cycle Housing Element to remain in place, and would include implementation of the adopted 6th Cycle Housing Element, including the rezoning of sites and adoption of Objective Design and Development Standards (ODDS) efforts, including the implementation of Programs 4, 8, 16, and 19.

Program 4 provides for the rezoning of Opportunity Sites to accommodate the RHNA, with a modest buffer. Development accommodated under Alternative 1b would be up to approximately 1,147 dwelling units on Housing Element sites with existing General Plan land use designations and zoning to accommodate residential development, including 811 units on Opportunity Sites and approximately 187 accessory dwelling units and SB 9 units.

Under Alternative 1b, Opportunity Sites 401 and 402 would not be included in the adopted Housing Element and there would be no increase in development potential on Opportunity Site 303 (which decreases from 129 units of realistic capacity designated under the Project to 90 units under Alternative 1b) or Opportunity Site 84 (which decreases from 94 units under the Project to 80 units under Alternative 1b). Under Alternative 1b, there would an increase in the development potential of Opportunity Sites 23, 24, 39, 44, 47, 201, 207, and 301, which are modified to have overlays that allow up to 29 units per acre under the Project, rather than overlays that accommodate 43-49 units per acre under Alternative 1b. Under the Project, Sites 85 and 209 along with two parcels of Site 44 and one parcel of Site 207 would be removed – these sites would continue to be developed under Alternative 1b.

Alternative 1b would intensify the zoning of the Opportunity Sites to accommodate additional very low, low, moderate, or above moderate-income housing. Four zoning overlays would be implemented under Alternative 1b: Housing-49, MU-49/85%, Housing-70, and MU-70/85%. Two zoning overlays – Housing-29 and MU-29/85% – would not be developed or implemented under Alternative 1b.

The City would continue to make specific publicly-owned sites available for development during the 2023-2031 Housing Element planning period: Sites 75, 78, 84, and APN 065-062-19. These sites are planned to remain in City ownership and would be made available for development through long-term leases, as described in Program 8. This inventory would also include the Caltrans site (Site 85), which is proposed to be removed from the inventory under the Project.

Program 16 would amend the Zoning Ordinance to remove constraints to housing and accommodate a variety of housing types under Alternative 1b, similar to the Project as described in Chapter 2, Project Description.

The development and adoption of ODDS would still occur under Program 19, similar to the proposed Project.

ALTERNATIVE 2 – REDUCED SITES

Alternative 2 focuses on removing sites from the Amended Housing Element that have challenging geographic locations. Specifically, Opportunity Sites that are located in micro-analysis zones (MAZs) that have high residential VMT levels (>18.0 per capita) in the Cumulative + Project scenario were removed. Removal of these sites reduces the number of housing units far from employment and services hubs, and concentrates new housing more proximate to those uses. Due to the lack of direct routes through the city to identified evacuation routes, sites that have high VMT levels would also have longer travel distances and times to those routes in an emergency. Additionally, Opportunity Sites located in high-risk landslide hazard areas (rated as 8 or above) were also removed from the list of potential sites to be implemented by the Amended Housing Element. This alternative reduces the risk of natural disasters adversely affecting a significant number of housing units. Steep slopes increase the risk of landslides, liquefaction, or slope instability. Sites that have been removed from the Opportunity Sites list would continue to accommodate development as allowed by the adopted General Plan; however, this alternative would limit future development of the affected Opportunity Sites.All other Opportunity Sites identified in the Amended Housing Element and proposed to be implemented under the Amended Housing Element project would be rezoned as anticipated under the Project.

As a result of Alternative 2, the number of units to be developed under the implementation of the Amended Housing Element would be 1,074, which meets the minimum RHNA requirement of 724 units. However, the development buffer (423 units) of the Amended

Housing Element sites would be reduced to 350 units which would remain adequate to accommodate modifications to the inventory during the 6th Cycle.

Some sites would be removed from the Opportunity Sites and remain zoned according to their existing zoning designation (Sites 8, 23, 24, 56, 59, 63, 86, 87, 201, 207, and 212).

ALTERNATIVE 3 – MODIFIED SITES

Alternative 3 identifies different sites to be rezoned for residential and mixed-use development through implementation of the Amended Housing Element. The purpose of this alternative is to relocate anticipated residential units from areas that are far from community services or do not have convenient freeway access, and place them closer to community services such as commercial, employment, and neighborhood services, or freeway access. This alternative would not rezone 11 Opportunity Sites to higher density residential or mixed-use, instead keeping those sites as they are currently designated on the existing Zoning Map. The Opportunity Sites that would not be rezoned are sites 8, 9, 10, 55, 56, 59, 63, 75, 101, 212, and 301.

Alternative 3 would include the addition of a new Opportunity Site, formerly known as Opportunity Site 67, to the Housing Element. This 4.36-acre site, located at 2200 Marinship Way, is currently vacant. It is surrounded by surface parking and an office building to the north, another office building to the east, Marinship Park to the south, and Bridgeway to the west. This site would be rezoned from its current designation of Industrial (I) to a new overlay Mixed Use (MU-25/85%), which would create the opportunity to construct up to 109 dwelling units and approximately 9,500 square feet of ground floor mixed use. This site is proximate to community services and is adjacent to a main evacuation route, Bridgeway, in the event of an emergency.

The total number of units that could be accommodated under Alternative 3 is the same as the Amended Housing Element project of 1,147 units.

Some sites would remain zoned according to their existing zoning designation (Sites 8, 9, 10, 55, 56, 59, 63, 75, 101, 212, and 301) and one site would be added to the Opportunity Sites and would be rezoned to accommodate residential uses (Site 67).

Alternative 4 – Historic Preservation

Alternative 4 would focus on preserving properties located within and adjacent to the Sausalito Downtown Historic District. The purpose of this alternative is to ensure that future development would not adversely affect known historic resources or properties, particularly those in the Downtown Historic District. The city has a rich history and there are City of Sausalito Historic Landmarks, a National Parks Service Certified Historic District, properties within the Certified Historic District listed on the California Register of Historic Resources, properties within the Certified Historic District eligible for the National Register of Historic Resources, ~~potentially eligible historic properties,~~ and properties eligible for listing~~ed~~ on the

National Register of Historic Places and/or the California Register of Historic Resources located throughout the city, and accommodating the City's housing needs while preserving the character of the City, including its historic resources, is an objective of the Project. However, this alternative geographically focuses on those parcels where intensification of development could affect resources within the Downtown Historic District.

The Amended Housing Element identifies five properties anticipated to accommodate additional residential development which are within or adjacent to the Downtown Historic District:

- Opportunity Site 201 is within the Downtown Historic District and currently consists of a commercial building with four retail storefronts, and a surface parking lot. Opportunity Site 201 (APN 065-132-16) contains the Marin Fruit Co., a designated historic resource listed on the California Historic Preservation Office state registry and listed on the California State Parks Built Environment Resource Directory;
- Amended Housing Element Inventory Site, located at 721/729 Bridgeway, is within the Downtown Historic District and contains a commercial building;
- Opportunity Site 23 is adjacent to, but outside of, the Downtown Historic District, and is currently vacant;
- Opportunity Site 24 is adjacent to, but outside of, the Downtown Historic District, and is currently vacant; and
- Opportunity Site 202 is adjacent to, but outside of, the Downtown Historic District and currently houses the Alta Mira Recovery Programs surface parking lots and two small buildings.

The removal of these rezone sites helps preserve the character of the historic area by not inviting redevelopment or densification through rezoning. The historic context of the district can remain intact. There are several buildings in the Downtown Historic District that are potentially eligible historic properties. Demolition of existing buildings, construction of new housing units, vibration from heavy construction equipment, or construction mishaps on an Amended Housing Element site could adversely impact an existing adjacent historic resource. Opportunity Site 201 and the Inventory Site within the Downtown Historic District are the two sites that are most likely to unintentionally damage a potentially eligible historic resource.

Opportunity Sites 23, 24, and 202 are adjacent to the Downtown Historic District. Removing the sites adjacent to the Downtown Historic District would allow those sites to be retained as a type of transition zone from the historic district to other redeveloped, densified parts of the city.

Alternative 5 – modified project

Alternative 5 would slightly reduce development potential in the northern portion of the City to preserve the existing setting. This would include several adjustments to ensure accommodation of the RHNA. Under this alternative, 3 scenarios are possible:

- **Scenario 1** – The development of Site 84 (MLK Property) would be decreased by reducing the number of units from 94 to 80 units. This would reduce the building heights and density to diminish impacts on aesthetics. Scenario 1 would require passage of a ballot measure to authorize development of the MLK Property in light of restrictions in Ordinance No. 1128.

- **Scenario 2 –** The development of Site 84 would be further reduced by decreasing the number of units from 94 units to 50 units. This would reduce the building heights and density to diminish impacts on aesthetics. Scenario 2 would also require passage of a ballot measure.

- **Scenario 3 –** Site 84 would not be developed. This would not only reduce the building heights and density to diminish impacts on aesthetics, but also preserve community resources. If, under Scenario 3, the vote authorizing the lifting of restrictions in Ordinance 1128 fails to pass, Site 202's minimum number of units would be increased and Site 14 (Spencer Avenue Fire Station) and Site 52 (City Hall parking lot) would then be rezoned to accommodate up to 20 to 25 units each. This would ensure accommodation of the RHNA.

Development on Site 14 and/or Site 52 could potentially also occur if needed to ensure no net loss of capacity in the City's sites needed to accommodate the unmet portion of the City's RHNA as required by Government Code Section 65863.

Each of these scenarios provides flexibility in accommodating the RHNA, while also reducing development in the northern portion of the City. **Table 4-6** identifies the current and planned uses for each of the sites under Alternative 5, as well as the anticipated housing unit counts. **Figure 4-7** shows which parcels would be rezoned under Alternative 5, and identifies Site 14 and Site 52 which could be developed in the event of a RHNA shortfall. For purposes of the analysis below, Alternative 5 assumes a conservative maximum by analyzing Site 84 under Scenario 1 and the potential use of Site 14 and Site 52 under Scenario 3.

Environmentally Superior Alternative

The qualitative environmental effects of each alternative in relation to the Amended Housing Element project are summarized in **Table ES-5**.

CEQA Guidelines Section 15126(e)(2) requires an EIR to identify an environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR

must also identify an environmentally superior alternative from among the other alternatives. Here, the No Project Alternative is the environmentally superior alternative.

From the alternatives to the proposed Project evaluated in this EIR, the environmentally superior alternative would be Alternative 2 as it would have fewer impacts on the environment than the proposed Project, as shown in Table ES-5.

TABLE 4-12: COMPARISON OF ALTERNATIVES

ENVIRONMENTAL TOPIC AREA	AMENDED HOUSING ELEMENT SIGNIFICANCE LEVEL	ALTERNATIVE 1A NO PROJECT/NO REZONING	ALTERNATIVE 1B NO PROJECT/ADOPTED HOUSING ELEMENT IMPLEMENTATION	ALTERNATIVE 2 REDUCED SITES	ALTERNATIVE 3 MODIFIED SITES	ALTERNATIVE 4 HISTORIC PRESERVATION	ALTERNATIVE 5 MODIFIED PROJECT
Aesthetics, Light, and Glare	SU	Less	Worse	Less	Less	Less	Similar
Air Quality	LTS	Less	Less	Less	Less	Less	Less
Biological Resources	LTSWM	Similar	Similar	Less	Less	Similar	Similar
Cultural Resources/Tribal Cultural Resources	SU	Similar	Worse	Less	Less	Less	More
Energy	LTS	Less	Similar	Less	Similar	Less	Less
Geology, Soils, and Seismicity	LTSWM	Less	Similar	Less	Less	Less	Similar
Greenhouse Gas Emissions	LTS	Less	Worse	Less	Less	Less	Less
Hazards and Hazardous Materials	LTS	Less	Similar	Less	Similar	Similar	Similar
Hydrology and Water Quality	LTSWM	Similar	Similar	Less	Similar	Less	Similar
Land Use	LTS	Less	Similar	Less	Less	Less	Similar
Noise	LTSWM	Less	Similar	Similar	Similar	Less	Similar
Population and Housing	LTS	Less	Similar	Similar	Similar	Less	Similar
Public Services and Utilities	LTS	Less	Similar	Less	Similar	Less	Less
Transportation	SU	Less	Worse	Less	Less	More	Less
Utilities and Service Systems	SU	Less	Similar	Less	Similar	Less	Less
Wildfire	SU	Less	Similar	Less	Similar	Less	Similar

Notes:
NI = No Impact
LTS = Less than Significant
LTSWM = Less than Significant with Mitigation
SU = Significant and Unavoidable
Source: De Novo Planning Group, 2024.

Pages ES-25 and ES-26, Executive Summary Matrix text is revised to read:

Table ES-6~~5~~ below summarizes impacts, mitigation measures, and resulting level of significance after mitigation for the relevant environmental issue areas evaluated for the Amended Housing Element. The table is intended to provide an overview; narrative discussions for issue areas are included in the corresponding section of this Draft EIR. Table ES-6~~5~~ is included in the Draft EIR as required by CEQA Guidelines Section 15123(b)(1).

Page ES-27, Table ES-5 is revised to read:

Impact 3.1-5: Development facilitated by the Amended Housing Element would ~~not~~ create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	~~Less than~~ Potentially Significant	**MM 3.1-5a Avoid Effects of Project Lighting During Operation.** Future residential projects and mixed use projects with a residential component shall implement the following design measures in order to reduce potential light and glare impacts: • To minimize spillover lighting and glare impacts, all lighting from the project, including parking lot lighting and exterior building lighting, shall be LED, have full-cutoff luminaires (meaning no light is emitted above the horizontal plane of the fixture), and shall be aimed specifically to only illuminate areas within the project site or adjacent public right-of-way. • All structures shall incorporate nonreflective exterior building materials in their designs, and the use of reflective glass shall be prohibited. **MM 3.1-5b Avoid Effects of Project Lighting During Construction.** Prior to the start of construction, future applicants shall prepare a Construction Lighting and Screening Plan. The Construction Lighting and Screening Plan should indicate aesthetic and lighting treatments for all construction work areas (i.e., maximum brightness values not to be exceeded by artificial bulbs, screening around project site to limit light and glare, use of non-reflective glass, etc.). The Plan shall identify methods used to ensure construction lighting is directional (aimed toward work areas, and not toward nearby sensitive receptors), and limited to sufficient wattage for safety and security. Construction areas visible to sensitive receptors shall be screened via curtains from public view. Construction screening materials shall be of sufficient height and appropriate color to minimize viewshed impacts, as determined appropriate by the applicable jurisdiction(s).	~~Less than~~ Significant and Unavoidable
Impact 3.1-6: Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable	~~Less than~~ Potentially Significant	~~None Required~~**MM 3.1-6:** Implement Mitigation Measures MM 3.1-5a and 3.1-5b	~~Less than~~ Significant and Unavoidable

projects, would ~~not~~ result in significant cumulative impacts with respect to aesthetics.			

Pages ES-28 and ES-29, the text for Mitigation Measure 3.3-1 is revised to read:

MM 3.3-1a Special Studies. Applicants of any projects that could result in a potential impact to special status species, or their habitat, shall be required to prepare a special study. The purpose of the special study is to identify appropriate measures to avoid or minimize harm to sensitive biological resources and to incorporate the recommended measures as conditions of approval for the project. If special-status plant or animal species may be present on a project site, a Qualified Biologist shall conduct a preconstruction survey within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If special-status species are identified on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified. Construction activities may resume when the Qualified Biologist determines that the species has moved out of harm's way through its own volition, the species may be safely relocated to similar habitat without loss of active nests or dens, or the nesting/breeding season for the special-status species concludes.

Detailed studies are not necessary in locations where past and existing development have eliminated natural habitat and the potential for the presence of sensitive biological resources.

MM 3.3-1b California red-legged frog. At any opportunity site west of U.S. Highway 101 or within 1,000 feet east of U.S. Highway 101, at least one month prior to the commencement of ground-disturbing activities, the opportunity site and a minimum 500-foot radius surrounding the opportunity site shall be assessed by a Qualified Biologist for the presence of California red-legged frog individuals and habitat features. Habitat features include both aquatic habitat such as plunge pools and ponds and terrestrial habitat such as burrows or other refugia. If habitat occurs, then no more than 48 hours prior to ground-disturbing activities the area shall be surveyed by a Qualified Biologist. Burrows and refugia sites shall be flagged or otherwise marked for avoidance; project construction activities shall avoid habitat features to the extent feasible. If California red-legged frogs are encountered during the assessment or project construction, the project activity shall not proceed or all work shall cease, and CDFW and USFWS shall immediately be notified. Work shall not proceed until the frog, through its own volition, moves out of harm's way and CDFW has provided permission in writing to proceed with the project construction. If California red-legged frog is encountered or the Qualified Biologist determines that impacts to the species are likely to occur, the opportunity site project applicant shall consult with USFWS pursuant to the Federal ESA and receive written approval from CDFW prior to the impact.

MM 3.3-1c California giant salamander. At any opportunity site that is both: 1) within 500 feet of a stream, and 2) either west of U.S. Highway 101 or within 1,000 feet east of U.S. Highway 101, a Qualified Biologist shall conduct a preconstruction survey for California giant salamander within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If California giant salamanders are found on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified, and the animal shall be allowed to move out of harm's way through its own volition. If the California giant salamanders must be disturbed, a Qualified Biologist shall relocate the animals into nearby suitable habitat that is out of harm's way.

MM 3.3-1d American badger. At any opportunity site west of U.S. Highway 101, a Qualified Biologist shall conduct a pre-construction survey for American badger and suitable dens within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If badgers are found on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified. If the occupied den must be disturbed, the opportunity site project applicant shall submit a relocation plan to CDFW and obtain CDFW's written approval of the plan, and a Qualified Biologist shall implement the CDFW-approved plan.

MM 3.3-1~~b~~e Nesting Bird Protection. All projects shall retain the services of a qualified biologist(s) to conduct a pre-construction nesting bird survey during the nesting season (February 1 through August 31) prior to any and all development that may remove trees or vegetation that may provide suitable nesting habitat for migratory birds or other bird species protected under the Fish and Game Code. If nests are found, the qualified biologist(s) shall identify and the project sponsor shall implement appropriate avoidance measures, such as fenced buffer areas or staged tree removal periods.

MM 3.3-1f Bat Roosts. Construction activities associated with removal of landscape and riparian trees, or the removal of an existing building, on opportunity sites shall occur between September 1 and April 30, which is outside of the breeding season for bat species, to the extent feasible.

If removal of landscape and riparian trees begin during the breeding period for bats (May 1 through August 31), a qualified biologist shall conduct a preconstruction survey within five days prior to the scheduled tree removal. The biological shall inspect all trees containing crevices and the bark or cavities for evidence of sign (i.e., guano). If no sign is observed, a letter report shall be submitted to the City for its records within 14 days of the survey and no additional measures associated with tree removal are required. If tree removal does not begin within five days of the

preconstruction survey, or if the removal of previously inspected trees halts for more than five days, an additional preconstruction survey is required within five days of the initiation or re-initiation of tree removal. If a maternity colony is observed within a tree, that tree shall not be removed until the breeding season has been completed. Alternatively, a qualified bat biologist may exclude individual day-roosting bats in consultation with CDFW, thereby allowing tree removal to continue after successful exclusion activities.

If construction activities on opportunity sites are anticipated to occur during the breeding season (May 1 through August 31), a qualified biologist shall conduct a nighttime emergence survey no later than one-half hour before sunset and continue until at least 3 hours after sunset to allow for detection of both day- and night-roosting bats. The survey shall be conducted within five days of the removal of landscape and riparian trees, or the removal of onsite buildings. If any bats are observed emerging from any of the buildings, the building(s) shall not be demolished until the breeding season has been completed.

MM 3.3-1g Townsend's big-eared bat. At any Project site where trees or abandoned buildings would be removed or heavily modified, prior to Project activities that would remove trees or modify buildings, a Qualified Biologist shall conduct a habitat assessment for bats. A Qualified Biologist shall have: 1) at least two years of experience conducting bat surveys that resulted in detections for relevant species, such as Townsend's bat, with verified project names, dates, and references, and 2) experience with relevant equipment used to conduct bat surveys. The habitat assessment shall be conducted a minimum of 30 to 90 days prior to the beginning of Project activities.

For tree removal, the habitat assessment shall include a visual inspection of potential roosting features (e.g., cavities, crevices in wood and bark, exfoliating bark for colonial species, suitable canopy for foliage roosting species). If suitable habitat is found, it shall be flagged or otherwise clearly marked. Trees shall be removed only if: a) presence of bats is presumed, or documented during the surveys described below, in trees with suitable habitat, and removal using the two-step removal process detailed below occurs only during seasonal periods of bat activity, from approximately March 1 through April 15 and September 1 through October 15, or b) after a Qualified Biologist conducts night emergence surveys or completes visual examination of roost features that establish absence of roosting bats. Two-step tree removal shall be conducted over two consecutive days, as follows: 1) the first day (in the afternoon), under the direct supervision and instruction by a Qualified Biologist with experience conducting two-step tree removal, limbs and branches shall be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices, or deep bark fissures shall be avoided, and 2) the second day the entire tree shall be removed.

For modification of buildings, the Qualified Biologist shall conduct a survey for roosting bats. If roosting bats are detected, a bat avoidance and exclusion plan shall be implemented. The plan shall recognize that both maternity and winter roosting seasons are vulnerable times for bats and require exclusion outside of these times, generally between March 1 and April 15 or September 1 and October 15 when temperatures are sufficiently warm. Work operations shall cease if bats are found roosting within the Project area and CDFW shall be consulted.

For loss of suitable bat habitat trees or impacts to buildings or structures occupied by bats subject to the above bat avoidance and exclusion plan, the Project shall provide habitat mitigation in the form of: 1) native tree planting at an appropriate ratio to offset canopy and temporal habitat loss and tree planting maintenance for a minimum of 5 years and until success criteria are met, or 2) suitable bat habitat structures. A Qualified Biologist shall prepare and submit a bat habitat mitigation plan to CDFW and obtain CDFW's approval of the plan prior to the start of Project activities, and shall implement the plan, unless otherwise approved in writing by CDFW.

MM 3.3-1h Franciscan thistle (*Cirsium andrewsii*). Prior to issuance of a demolition, grading, or building permit, a qualified plant biologist approved by CDFW shall conduct a preconstruction survey for Franciscan thistle (*Cirsium andrewsii*) (blooms June-July) on opportunity sites. The survey shall be conducted following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.[1] If special-status plant species (e.g., Franciscan thistle) are found, the project applicant shall prepare a transplantation and monitoring plan in consultation with CDFW. The transplantation and monitoring plan will be subject to review and approval by CDFW before the start of any construction activities in the special-status plant species area. This plan will describe the intent and anticipated success of transplanting, and specify success criteria for transplanted plants and related long-term protection and management of transplanted plants. Other methods of minimizing impacts on the resource may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.

[1] California Department of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Sacramento, CA.

Pages ES-29 and ES-30, the text for Mitigation Measure 3.3-2 is revised to read:

MM 3.3-2a ~~**Botanical Reports.** Prior to issuance of a demolition, grading, or building permit require detailed botanical reports for new development projects that are located within threatened plant habitat areas or within Sensitive Natural Communities, including coast live oak (*Quercus agrifolia-Arbutus menziesii-Umbellularia californica*), and eelgrass (*Zostera Marina*). If sensitive resources are identified on a proposed project site, recommendations to protect the sensitive resources shall conform with applicable State and Federal regulations regarding their protection and may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.~~

Botanical Reports and Special-Status Plant Survey. At all opportunity sites not composed of hardscape or ornamental vegetation, a Qualified Biologist shall conduct botanical surveys during the appropriate blooming period and conditions for all special-status plants that have the potential to occur at the opportunity site and adjacent to it where plants could be indirectly impacted, prior to the start of construction. Surveys shall be conducted following CDFW's *Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*[2] and include checking reference sites for target special-status plant species. Per this protocol, more than one year of surveys may be necessary if, for example, lack of rain inhibits growth of annual plants. If any special-status plant species are observed, the opportunity site project applicant shall fully avoid direct and indirect impacts to all individuals and provide an avoidance plan to CDFW and obtain CDFW written approval of the plan. If full avoidance is not possible, project activities may not commence until the opportunity site project applicant has consulted with CDFW and obtained CDFW's written approval prior to the start of construction, which may include salvaging topsoil, transplanting and monitoring individuals, compensatory habitat mitigation, or other measures, based on the life history of the species and other relevant factors.

MM 3.3-2b **Eelgrass (*Zostera marina*) beds and red algae (*Gracilaria sp*.).** ~~Prior to issuance of a demolition, grading, or building permit require detailed biological reports for new development projects that are located within or adjacent to Richardson Bay's aquatic ecosystem. If sensitive aquatic resources (e.g., eelgrass and red algae) are identified on or adjacent to a proposed project site, recommendations to protect the sensitive aquatic resources shall conform with~~

[2] California Department of Fish and Wildlife, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Available: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants. Accessed: November 27, 2024.

~~applicable State and Federal regulations regarding their protection, including NOAA's California Eelgrass Mitigation Policy and Implementation Guideline. The biological report may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.~~ Prior to issuance of a demolition, grading, or building permit, a qualified plant biologist approved by CDFW shall conduct a preconstruction survey for eelgrass and red algae during their blooming periods on opportunity sites that are located within or adjacent to Richardson Bay's aquatic ecosystem. The survey shall be conducted following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.[3] If special-status plant species (e.g., eelgrass and red algae) are found, the project applicant shall prepare a transplantation and monitoring plan in consultation with CDFW. The transplantation and monitoring plan will be subject to review and approval by CDFW before the start of any construction activities in the special-status plant species area. This plan will describe the intent and anticipated success of transplanting, and specify success criteria for transplanted plants and related long-term protection and management of transplanted plants. Other methods of minimizing impacts on the resource may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.

MM 3.3-2c Stream and Wetland Mitigation and Resource Agency Permits. Development on each opportunity site shall be designed to avoid and minimize impacts to streams, wetlands, and other waters. If impacts to any streams cannot be avoided, then prior to the impacts the opportunity site project applicant shall submit an LSA notification to CDFW and comply with the Streambed Alteration Agreement, if issued. Additionally, if impacts to any streams, wetlands, or other waters cannot be avoided, the opportunity site project applicant shall obtain authorization from the RWQCB and USACE pursuant to the Porter-Cologne Water Quality Control Act and Clean Water Act sections 401 and 404, as applicable. Impacts to waters, wetlands, and riparian habitat subject to the permitting authority of CDFW, the RWQCB, or the USACE shall be mitigated by providing restoration at a minimum 3:1 restoration to impact ratio in areas for permanent impacts and 1:1 ratio for temporary impacts, unless otherwise approved in writing by CDFW or otherwise required by the RWQCB or USACE. A Habitat Mitigation and Monitoring Plan shall be prepared by the opportunity site project applicant and implemented for the proposed mitigation. The opportunity site project applicant shall obtain written approval of this plan from

[3] California Department of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Sacramento, CA.

CDFW, the RWQCB, or the USACE as applicable prior to any disturbance of stream or riparian habitat, wetlands, or other waters.

Pages ES-52 and ES-53, Mitigation Measure 3.14-2 is revised to read:

MM 3.14-2a Residential projects that do not include any retail space (all-residential projects) proposed on Inventory Sites or Opportunity Sites in the Amended Housing Element shall:

- Require the individual project developer to participate in a VMT Exchange whereby developers can pick a VMT mitigation action from an approved list and either pay for someone else to implement that action or do it themselves. These actions shall include financial incentives for individuals, contributions to funds for identified capital improvement projects, and contributions to funds for enhancing transit services.

- Prior to issuance of a building permit, require the individual project developer to submit, in writing, proof of contribution to a VMT Exchange, including disclosure of how the funding will be used.

- Alternatively, an individual project developer may make a fair share contribution to the "Regional Transportation Planning (RTP) project - Express Bus/Service Expansion from the Golden Gate Bridge, Highway and Transportation District." This regional transit project proposes to implement improvements to existing express bus service along Highway 101 and I-580, including frequency upgrades (20–40-minute peak headways on routes 4, 18, 27, 101, 40X and 56X). Increased frequency for bus service along the Project area could encourage public transit ridership, resulting in lower VMT.

~~Residential and nonresidential development projects occurring on sites identified in the Amended Housing Element shall implement travel demand measures (TDM) to reduce VMT.~~

~~VMT reduction techniques will vary depending on the location of each development site and the availability of nearby transportation services, though utilization of TDM strategies will play a major role in most cases. The publication *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, California Air Pollution Control Officers Association (CAPCOA), 2021, contains transportation-focused measures that may be implemented to reduce VMT. Following are TDM and other strategies that may be applied; additional measures beyond those provided in this list may be allowed if supported by evidence.~~

- ~~Subsidize transit passes;~~

- ~~Provide or participate in established ride-matching program(s);~~
- ~~Provide information, educational, and marketing resources for residents, employees, and visitors managed by a TDM Coordinator;~~
- ~~Complete bus stop improvements or on-site mobility hubs;~~
- ~~Construct off-site pedestrian and/or bicycle network improvements, particularly those that fill gaps and/or connect the project and surrounding neighborhood to transit;~~
- ~~Reduce parking supply at affordable or senior residential projects and projects that are well-served by transit;~~
- ~~Unbundle residential parking costs (sell or lease parking separately from the housing unit) where appropriate on-street management is present;~~
- ~~Provide or participate in car-sharing, bike sharing, or scooter sharing program(s);~~
- ~~Emergency Ride Home Program (applies to nonresidential uses);~~
- ~~Contribute to future VMT mitigation fee programs, banks, or exchanges as they become available.~~

MM 3.14-2b Nonresidential or mixed use projects proposed on Inventory Sites or Opportunity Sites in the Amended Housing Element shall implement a Transportation Demand Management Program (TDM Program). The TDM Program shall include strategies, incentives, and tools to provide opportunities for employees and patrons to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to non-residential uses to the individually proposed project.

The TDM Program shall include:

1. TDM 1/Encourage Alternative Modes of Transportation (Public Bus and Vanpool) – The individually proposed project shall encourage alternative modes of transportation use by providing monetary incentives to employees and patrons such as:

- Discounted goods or services with proof of a same-day transit ticket or registered transit card (the regional fare payment method).
- Transit and/or Multi-Modal Subsidy, providing pre-tax commuter benefits for employees.
- Marketing and outreach campaign for transit usage and ridesharing.

- Provision of fair-share on-site and/or off-site improvements to bus stops within ¼-mile of an individually proposed project. Such improvements may include the provision of new or improved lighting, new benches and overhead canopies, additional bench capacity if needed, new or expanded bike racks, or similar physical improvements.

2. TDM 2/Encourage Carpools and Zero-Emission Vehicles – Individually proposed projects shall provide incentives that would encourage carpooling and zero-emission vehicles as a means for sharing access to and from the site, including the following:

- Provide incentives for carpools or zero-emission vehicles, including preferential parking with the number of parking spots in excess of applicable requirements, reduced or subsidized parking costs, or other discounts/benefits.

- For projects that include dedicated parking areas with more than ten (10) parking spaces provided, provide one (1) parking space with an electric vehicle charging station.

3. TDM 3/Encourage Active Transportation – The Project shall include features which enhance access for bicyclists and pedestrians including the following:

- Provide bicycle parking in excess of applicable code requirements.

- Coordinate bike pools and walk pools.

- Provide sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the project site.

Employers shall report the efficacy of its trip reduction program to the City of Sausalito. The "employer program manager" – the employee with policy and budget authority who is responsible for the implementation of the employer trip reduction program or employer trip reduction plan and for fulfilling the requirements of this rule – shall conduct an employee trip survey using a uniform survey form prepared by the Marin County CMA. A summary of the trip results shall be submitted annually to the City of Sausalito.

Revisions to specified pages of Section 3.1, Aesthetics, are identified below.

SECTION 3.1, AESTHETICS

Pages 3.1-28 through 3.1-29, Impact 3.1-6 are revised to read:

Impact 3.1-6: Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, would ~~not~~ result in significant cumulative impacts with respect to aesthetics.

The geographic context for analysis of cumulative impacts related to aesthetics includes the unincorporated lands surrounding the Planning Area, including Marin City. In general, potential visual impacts take in the immediate surroundings in an urbanized area; thus, the analysis of cumulative aesthetic impacts focuses on areas that share a viewshed with the City's Planning Area. This analysis evaluates whether impacts of the Amended Housing Element, together with impacts of cumulative development, would result in a cumulatively significant impact with respect to aesthetics. This analysis then considers whether incremental contribution of the impacts associated with implementation of the Amended Housing Element would be considerable. Both conditions must apply for cumulative effects to rise to the level of significance.

Existing vistas and visual resources in the Planning Area include natural terrain, ridgelines, ~~and~~ Marinship view corridors with views of the waterfront and bay, and views of and along the Highway 101 corridor. Existing vistas and visual resources in the unincorporated lands surrounding the Planning Area and region include a variety of landscape settings, such as pastoral and rural areas, beaches and coastal bluffs, and the Pacific Ocean, especially from and along trails, particularly near the coast.[4] Existing sources of nighttime light include those common to developed areas or areas through which traffic travels regularly (e.g., street lights, parking lot lighting, building lighting, illuminated signs, vehicle headlamps, interior building lighting visible through windows). Existing sources of glare include reflection of sunlight and artificial light off windows, buildings, and other surfaces in the day, and glare from inadequately shielded or improperly directed light sources at night. Nighttime light sources in areas with less intense development and lower population density, such as rural areas in the west and inner-rural areas of the county, are typically sparser than in more developed or more highly populated areas, such as urban areas in the east, especially

[4] County of Marin, 2022. Housing & Safety Element Update to the Marin Countywide Plan Draft Environmental Impact Report. October. Available: https://www.marincounty.org/-/media/files/departments/cd/planning/environmental-impact/housing-and-safety-elements-eir-docs/marin-hese-public-draft-eir-oct-2022.pdf?la=en. Accessed November 7, 2023. Page 4-3.

along the Highway 101 corridor. Therefore, sources of nighttime light in the county would generally be expected to diminish from east to west.[5]

The proposed Amended Housing Element would contribute to the urbanization of the City and nearby areas of the unincorporated County that share a viewshed with the City and result in the construction of new structures that could impede views of existing scenic vistas and visual resources as well as change views of the City's natural and built environment, including the hillsides, waterfront, and Highway 101 corridor. ~~However, d~~Development of future housing and mixed use projects subject to the ODDS would be reviewed for consistency with Title 10A that will be created for the ODDS. Compliance with the requirements within the General Plan and Zoning Code would reduce visual impacts and light and glare impacts to the greatest extent feasible.

Additionally, potential cumulative aesthetic impacts to eligible scenic highways would be reduced ~~to below a level of significance~~ through participation in the State Scenic Highway program and local ordinances and policies. Similarly, cumulative projects within unincorporated Marin County would be required to comply with applicable Marin Countywide Plan policies and programs and adhere to development and design standards in the Marin County Municipal Code that address aesthetics, including lighting and glare, the alteration of scenic resources and natural features, the alteration of views of scenic resources and natural features, and the alteration of views of the open waters of the Bay and land masses beyond the open waters, as seen from public or special vantage points.

Nevertheless, as cumulative development in the Bay Area increases over time, impacts related to aesthetics would incrementally increase. The Project would result in construction and operation of development projects that would directly alter visual features, be placed in a location such that the intensity and height of development could obscure views, and create new sources of lighting and glare that would contribute to significant aesthetic changes to the City and nearby areas. For these reasons, cumulative impacts to aesthetics, State Scenic Highways, and~~or~~ nighttime lighting and daytime glare would be ***~~less than~~potentially significant***.

Level of Significance before Mitigation

~~Less than~~ Potentially Significant

[5] County of Marin, 2022. Housing & Safety Element Update to the Marin Countywide Plan Draft Environmental Impact Report. October. Available: https://www.marincounty.org/-/media/files/departments/cd/planning/environmental-impact/housing-and-safety-elements-eir-docs/marin-hese-public-draft-eir-oct-2022.pdf?la=en. Accessed November 7, 2023. Page 4-4.

Mitigation Measures

~~None Required~~

MM 3.1-6: Implement Mitigation Measures MM 3.1-5a and 3.1-5b

Mitigation Measures

The only methods to completely avoid the Project's contribution to cumulative aesthetic impacts would be to severely limit the development potential of residential and mixed use projects, including on the Inventory Sites and Opportunity Sites, and/or reduce building heights, building mass, and lot coverage for the proposed overlays. These types of mitigation are not consistent with the objective of the proposed Amended Housing Element to encourage and facilitate residential development, to affirmatively further fair housing opportunities, and to accommodate the City's housing needs, including identifying adequate sites accommodate the RHNA allocation in order to comply with Government Code Section 65863. As such, this impact would be significant and unavoidable.

Revisions to specified pages of Section 3.1, Biological Resources, are identified below.

SECTION 3.3, BIOLOGICAL RESOURCES

Page 3.3-13, Table 3.3-3, the entry "Spring Run Chinook Salmon of the Sacramento River Drainage" under the heading "Fish" is revised to read:

~~**SPRING-RUN CHINOOK SALMON OF THE SACRAMENTO RIVER DRAINAGE *ONCORHYNCHUS TSHAWYTSCHA***~~ **CENTRAL VALLEY SPRING-RUN CHINOOK SALMON *ONCORHYNCHUS TSHAWYTSCHA***	FT/CT	~~Spring-run Chinook enter the San Francisco Bay for migration upstream from mid-February through July. Spawning typically begins in late August and may continue through October. Juveniles emerge in November and December in most locations, but may emerge later when water temperature is cooler.~~ Spring-run Chinook Salmon enter the Sacramento River for migration from late March through September. Adults hold in cool water habitats through the summer, then spawn in the fall from mid-August through early October. Spring run juveniles migrate soon after emergence as young-of-the-year, or remain in freshwater and migrate as yearlings.

Page 3.3-14, the following is added to the top of the page, within Table 3.3-3:

WHITE STURGEON *ACIPENSER TRANSMONTANUS*	FT/CC	White sturgeon are native to several large North American rivers that drain to the Pacific Ocean. They primarily live in estuaries of large rivers, but migrate to spawn in freshwater, and travel long distances between river systems. Reproducing populations have been documented along the West Coast, from northern Mexico up to the Aleutian Islands in Alaska. White sturgeon are commonly found in deep, soft bottomed areas of estuaries, where movements in the water column is dependent on salinity.

Pages 3.3-25 through 3.3-27, Impact 3.3-1 are revised to read:

Impact 3.3-1 With mitigation, development facilitated by the Amended Housing Element would not have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species.

As discussed in the Existing Setting section, five special-status plant species and 13 special-status animal species have been recorded to occur within the Sausalito Planning Area. The special-status animal species include five bird species, four fish species, three invertebrate species, and one mammal species. Many other special-status plant and animal species have been documented in the nine-quadrangle search area surrounding the Planning Area, including 89 plant species (see Table 3.3-2) and ~~55~~ 56 animal species (25 bird species, ~~9~~ 10 fish species, 7 invertebrate species, and 14 mammal species) (see Table 3.3-3). Subsequent development could result in the direct/indirect loss or indirect disturbance of special-status plant or animal species or their habitats that are known to occur, or have potential to occur, in the region.

The Project has the potential to impact California red-legged frog and California giant salamander directly through crushing or removal during grading, or indirectly through hydrological impacts to habitat. The Project has potential to impact American badger and their dens through crushing or removal during grading.

The Project has potential to impact Townsend's big-eared bat through removal of roost trees and structures. Removing a roost tree or building during breeding or hibernating seasons could kill many bats as they roost together in a colony. Bats are unusual for small mammals because they are long-lived and have a low reproductive rate (Johnston 2004). Lifespans of 15 years are not uncommon, and most species have only one young per pair per year.[6] Bats also aggregate in colonies, some of which contain all the bats of a species from a wide area.[7] The combination of these three factors (long lifespan, few young per year, and aggregation into colonies) means that if the Project impacts bat roosts, the Project may cause a substantial adverse effect to the regional population of Townsend's big-eared bat.

[6] Johnston, D, Tartarian, G, and Poerson, E. (2004). California Bat Mitigation Techniques, Solutions, and Effectiveness. Sacramento, CA.

[7] Johnston, D, Tartarian, G, and Poerson, E. (2004). California Bat Mitigation Techniques, Solutions, and Effectiveness. Sacramento, CA.

All of the species above are listed as California Species of Special Concern (SSC); California red-legged frog is also listed as threatened under the Federal Endangered Species Act (ESA). CDFW designates certain vertebrate species as SSC because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction or extirpation in California. As such, impacts to species designated as SSC may be significant.

Franciscan thistle has a California Rare Plant Rank (CRPR) of 1B.2. Plants with a CRPR of 1B are rare throughout their range, endemic to California, and are seriously or fairly threatened. Most plants that are ranked 1B have declined significantly over the last century.[8] The additional threat rank of 0.2 indicates that 20 to 80 percent of their occurrences are threatened.[9] Franciscan thistle could be directly impacted through crushing or removal during grading, or indirectly through hydrological impacts to habitat. Additional special-status plant species may also occur. If special-status plants occur within or adjacent to the Project site and would be directly or indirectly impacted by the Project, the Project may result in significant impact to special-status plants.

Significant impacts on special-status plant species associated with individual subsequent projects could include the direct loss of individual plants and of habitat areas associated with these special-status plant species. Indirect impacts to special-status plant species could include habitat degradation as a result of impacts to water quantity and quality.

Significant impacts on special-status animal species associated with individual subsequent projects could include, but are not limited to, the following:

- Increased mortality caused by higher numbers of automobiles in new areas of development;
- Direct mortality from the collapse of underground burrows or dens, resulting from soil compaction;
- Direct mortality resulting from the movement of equipment and vehicles through construction areas;
- Direct mortality resulting from removal of trees with active nests or roosts;
- Direct mortality or loss of suitable habitat resulting from the trimming or removal of obligate host plants;

[8] California Native Plant Society (CNPS), 2024. Inventory of Rare and Endangered Plants of California.
[9] California Native Plant Society (CNPS), 2024. Inventory of Rare and Endangered Plants of California.

- Direct mortality or loss of suitable habitat resulting from building demolition;
- Direct mortality resulting from the filling of wetlands features;
- Loss of breeding and foraging habitat resulting from the filling of seasonal or perennial wetlands;
- Loss of breeding, foraging, and refuge habitat resulting from the permanent removal of riparian vegetation;
- Loss of suitable habitat for vernal pool invertebrates resulting from the destruction or degradation of vernal pools or seasonal wetlands;
- Abandonment of eggs or young and subsequent nest failure for special-status nesting birds, including raptors, and other non-special status migratory birds resulting from construction-related noises;
- Loss or disturbance of rookeries and other colonial nests;
- Loss of suitable foraging habitat for special-status raptor species;
- Loss of migration corridors resulting from the construction of permanent structures or features; ~~and~~
- Impacts to fisheries/species associated with waterways~~.~~;
- Impacts to eelgrass habitats from growth along waterfront.

Special-status plant and animal species receive protection from various federal and State laws and regulations, including FESA and CESA. These regulations generally prohibit the taking of protected plant and animal species, or direct impacts to foraging or breeding habitat, without a special permit.

The General Plan includes policies and programs specifically designed to address these potential impacts to biological resources. Policy EQ-1.4 plainly states that threatened and endangered species shall be protected under the General Plan. To protect special-status species, Program EQ-1.1.1 requires new developments to identify and protect natural resources as conditions of project approval. Other policies found in the General Plan recognize the importance of protecting valuable wildlife habitat. Policy W-4.2 and Program W-4.2.2 call for preservation and enhancement of the open waters and habitats found in Richardson Bay, which have high ecological value for marine species such as eelgrass. Policy W-4.1 requires that no net loss of ecological functions occur as a result of uses, development, shoreline modifications, or expansion of existing uses. Program EQ-1.4.1 Special Studies (Threatened and Endangered Species) requires special studies for projects proposed in areas that could potentially impact threatened or endangered species habitat as identified in the Endangered Species Act. Program EQ 1.4.2 requires that the city continue to catalogue and update information on threatened and

endangered species and locally scarce species or habitats, and that this information will be used to review project proposals. Program ES 1.4.3 requires applicants to prepare a detailed botanical report for projects within threatened plant habitat areas.

Future development would comply with the various federal and State laws and regulations that protect special-status plant and animal species, including FESA and CESA. In addition, future projects would comply with requirements of the Sausalito Municipal Code and the General Plan policies and programs related to biological resources. However, individual opportunity sites may acquire special species over time, such as new species nesting on a vacant parcel. Therefore, the impact to special-status species is ***potentially significant***.

Level of Significance before Mitigation

Potentially Significant

Mitigation Measures

MM 3.3-1a Special Studies. Applicants of any projects that could result in a potential impact to special status species, or their habitat, shall be required to prepare a special study. The purpose of the special study is to identify appropriate measures to avoid or minimize harm to sensitive biological resources and to incorporate the recommended measures as conditions of approval for the project. If special-status plant or animal species may be present on a project site, a Qualified Biologist shall conduct a preconstruction survey within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If special-status species are identified on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified. Construction activities may resume when the Qualified Biologist determines that the species has moved out of harm's way through its own volition, the species may be safely relocated to similar habitat without loss of active nests or dens, or the nesting/breeding season for the special-status species concludes.

Detailed studies are not necessary in locations where past and existing development have eliminated natural habitat and the potential for the presence of sensitive biological resources.

MM 3.3-1b California red-legged frog. At any opportunity site west of U.S. Highway 101 or within 1,000 feet east of U.S. Highway 101, at least one month prior to the commencement of ground-disturbing activities, the

opportunity site and a minimum 500-foot radius surrounding the opportunity site shall be assessed by a Qualified Biologist for the presence of California red-legged frog individuals and habitat features. Habitat features include both aquatic habitat such as plunge pools and ponds and terrestrial habitat such as burrows or other refugia. If habitat occurs, then no more than 48 hours prior to ground-disturbing activities the area shall be surveyed by a Qualified Biologist. Burrows and refugia sites shall be flagged or otherwise marked for avoidance; project construction activities shall avoid habitat features to the extent feasible. If California red-legged frogs are encountered during the assessment or project construction, the project activity shall not proceed or all work shall cease, and CDFW and USFWS shall immediately be notified. Work shall not proceed until the frog, through its own volition, moves out of harm's way and CDFW has provided permission in writing to proceed with the project construction. If California red-legged frog is encountered or the Qualified Biologist determines that impacts to the species are likely to occur, the opportunity site project applicant shall consult with USFWS pursuant to the Federal ESA and receive written approval from CDFW prior to the impact.

MM 3.3-1c California giant salamander. At any opportunity site that is both: 1) within 500 feet of a stream, and 2) either west of U.S. Highway 101 or within 1,000 feet east of U.S. Highway 101, a Qualified Biologist shall conduct a preconstruction survey for California giant salamander within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If California giant salamanders are found on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified, and the animal shall be allowed to move out of harm's way through its own volition. If the California giant salamanders must be disturbed, a Qualified Biologist shall relocate the animals into nearby suitable habitat that is out of harm's way.

MM 3.3-1d American badger. At any opportunity site west of U.S. Highway 101, a Qualified Biologist shall conduct a pre-construction survey for American badger and suitable dens within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If badgers are found on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified. If the occupied den must be disturbed, the opportunity site project applicant shall submit a relocation plan to CDFW

and obtain CDFW's written approval of the plan, and a Qualified Biologist shall implement the CDFW-approved plan.

MM 3.3-1~~b~~e Nesting Bird Protection. All projects shall retain the services of a qualified biologist(s) to conduct a pre-construction nesting bird survey during the nesting season (February 1 through August 31) prior to any and all development that may remove trees or vegetation that may provide suitable nesting habitat for migratory birds or other bird species protected under the Fish and Game Code. If nests are found, the qualified biologist(s) shall identify and the project sponsor shall implement appropriate avoidance measures, such as fenced buffer areas or staged tree removal periods.

MM 3.3-1f Bat Roosts. Construction activities associated with removal of landscape and riparian trees, or the removal of an existing building, on opportunity sites shall occur between September 1 and April 30, which is outside of the breeding season for bat species, to the extent feasible.

If removal of landscape and riparian trees begin during the breeding period for bats (May 1 through August 31), a qualified biologist shall conduct a preconstruction survey within five days prior to the scheduled tree removal. The biological shall inspect all trees containing crevices and the bark or cavities for evidence of sign (i.e., guano). If no sign is observed, a letter report shall be submitted to the City for its records within 14 days of the survey and no additional measures associated with tree removal are required. If tree removal does not begin within five days of the preconstruction survey, or if the removal of previously inspected trees halts for more than five days, an additional preconstruction survey is required within five days of the initiation or re-initiation of tree removal. If a maternity colony is observed within a tree, that tree shall not be removed until the breeding season has been completed. Alternatively, a qualified bat biologist may exclude individual day-roosting bats in consultation with CDFW, thereby allowing tree removal to continue after successful exclusion activities.

If construction activities on opportunity sites are anticipated to occur during the breeding season (May 1 through August 31), a qualified biologist shall conduct a nighttime emergence survey no later than one-half hour before sunset and continue until at least 3 hours after sunset to allow for detection of both day- and night-roosting bats. The survey shall be conducted within five days of the removal of landscape and riparian trees, or the removal of onsite buildings. If any bats are observed emerging from

any of the buildings, the building(s) shall not be demolished until the breeding season has been completed.

MM 3.3-1g Townsend's big-eared bat. At any Project site where trees or abandoned buildings would be removed or heavily modified, prior to Project activities that would remove trees or modify buildings, a Qualified Biologist shall conduct a habitat assessment for bats. A Qualified Biologist shall have: 1) at least two years of experience conducting bat surveys that resulted in detections for relevant species, such as Townsend's bat, with verified project names, dates, and references, and 2) experience with relevant equipment used to conduct bat surveys. The habitat assessment shall be conducted a minimum of 30 to 90 days prior to the beginning of Project activities.

For tree removal, the habitat assessment shall include a visual inspection of potential roosting features (e.g., cavities, crevices in wood and bark, exfoliating bark for colonial species, suitable canopy for foliage roosting species). If suitable habitat is found, it shall be flagged or otherwise clearly marked. Trees shall be removed only if: a) presence of bats is presumed, or documented during the surveys described below, in trees with suitable habitat, and removal using the two-step removal process detailed below occurs only during seasonal periods of bat activity, from approximately March 1 through April 15 and September 1 through October 15, or b) after a Qualified Biologist conducts night emergence surveys or completes visual examination of roost features that establish absence of roosting bats. Two-step tree removal shall be conducted over two consecutive days, as follows: 1) the first day (in the afternoon), under the direct supervision and instruction by a Qualified Biologist with experience conducting two-step tree removal, limbs and branches shall be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices, or deep bark fissures shall be avoided, and 2) the second day the entire tree shall be removed.

For modification of buildings, the Qualified Biologist shall conduct a survey for roosting bats. If roosting bats are detected, a bat avoidance and exclusion plan shall be implemented. The plan shall recognize that both maternity and winter roosting seasons are vulnerable times for bats and require exclusion outside of these times, generally between March 1 and April 15 or September 1 and October 15 when temperatures are sufficiently warm. Work operations shall cease if bats are found roosting within the Project area and CDFW shall be consulted.

For loss of suitable bat habitat trees or impacts to buildings or structures occupied by bats subject to the above bat avoidance and exclusion plan,

the Project shall provide habitat mitigation in the form of: 1) native tree planting at an appropriate ratio to offset canopy and temporal habitat loss and tree planting maintenance for a minimum of 5 years and until success criteria are met, or 2) suitable bat habitat structures. A Qualified Biologist shall prepare and submit a bat habitat mitigation plan to CDFW and obtain CDFW's approval of the plan prior to the start of Project activities, and shall implement the plan, unless otherwise approved in writing by CDFW.

MM 3.3-1h Franciscan thistle (*Cirsium andrewsii*). Prior to issuance of a demolition, grading, or building permit, a qualified plant biologist approved by CDFW shall conduct a preconstruction survey for Franciscan thistle (*Cirsium andrewsii*) (blooms June-July) on opportunity sites. The survey shall be conducted following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.[10] If special-status plant species (e.g., Franciscan thistle) are found, the project applicant shall prepare a transplantation and monitoring plan in consultation with CDFW. The transplantation and monitoring plan will be subject to review and approval by CDFW before the start of any construction activities in the special-status plant species area. This plan will describe the intent and anticipated success of transplanting, and specify success criteria for transplanted plants and related long-term protection and management of transplanted plants. Other methods of minimizing impacts on the resource may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.

[10] California Department of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Sacramento, CA.

Page 3.3-29, Mitigation Measure 3.3-2 is revised to read:

MM 3.3-2a ~~**Botanical Reports.** Prior to issuance of a demolition, grading, or building permit require detailed botanical reports for new development projects that are located within threatened plant habitat areas or within Sensitive Natural Communities, including coast live oak (*Quercus agrifolia-Arbutus menziesii-Umbellularia californica*), and eelgrass (*Zostera Marina*). If sensitive resources are identified on a proposed project site, recommendations to protect the sensitive resources shall conform with applicable State and Federal regulations regarding their protection and may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.~~

Botanical Reports and Special-Status Plant Survey. At all opportunity sites not composed of hardscape or ornamental vegetation, a Qualified Biologist shall conduct botanical surveys during the appropriate blooming period and conditions for all special-status plants that have the potential to occur at the opportunity site and adjacent to it where plants could be indirectly impacted, prior to the start of construction. Surveys shall be conducted following CDFW's *Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*[11] and include checking reference sites for target special-status plant species. Per this protocol, more than one year of surveys may be necessary if, for example, lack of rain inhibits growth of annual plants. If any special-status plant species are observed, the opportunity site project applicant shall fully avoid direct and indirect impacts to all individuals and provide an avoidance plan to CDFW and obtain CDFW written approval of the plan. If full avoidance is not possible, project activities may not commence until the opportunity site project applicant has consulted with CDFW and obtained CDFW's written approval prior to the start of construction, which may include salvaging topsoil, transplanting and monitoring individuals, compensatory habitat mitigation, or other measures, based on the life history of the species and other relevant factors.

MM 3.3-2b **Eelgrass (*Zostera marina*) beds and red algae (*Gracilaria sp.*).** ~~Prior to issuance of a demolition, grading, or building permit require detailed biological reports for new development projects that are located within or adjacent to Richardson Bay's aquatic ecosystem. If sensitive aquatic resources (e.g., eelgrass and red algae) are identified on or adjacent to a proposed project site, recommendations to protect the sensitive aquatic resources shall conform with~~

[11] California Department of Fish and Wildlife, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Available: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants. Accessed: November 27, 2024.

~~applicable State and Federal regulations regarding their protection, including NOAA's California Eelgrass Mitigation Policy and Implementation Guideline. The biological report may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.~~ Prior to issuance of a demolition, grading, or building permit, a qualified plant biologist approved by CDFW shall conduct a preconstruction survey for eelgrass and red algae during their blooming periods on opportunity sites that are located within or adjacent to Richardson Bay's aquatic ecosystem. The survey shall be conducted following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.[12] If special-status plant species (e.g., eelgrass and red algae) are found, the project applicant shall prepare a transplantation and monitoring plan in consultation with CDFW. The transplantation and monitoring plan will be subject to review and approval by CDFW before the start of any construction activities in the special-status plant species area. This plan will describe the intent and anticipated success of transplanting, and specify success criteria for transplanted plants and related long-term protection and management of transplanted plants. Other methods of minimizing impacts on the resource may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.

MM 3.3-2c Stream and Wetland Mitigation and Resource Agency Permits. Development on each opportunity site shall be designed to avoid and minimize impacts to streams, wetlands, and other waters. If impacts to any streams cannot be avoided, then prior to the impacts the opportunity site project applicant shall submit an LSA notification to CDFW and comply with the Streambed Alteration Agreement, if issued. Additionally, if impacts to any streams, wetlands, or other waters cannot be avoided, the opportunity site project applicant shall obtain authorization from the RWQCB and USACE pursuant to the Porter-Cologne Water Quality Control Act and Clean Water Act sections 401 and 404, as applicable. Impacts to waters, wetlands, and riparian habitat subject to the permitting authority of CDFW, the RWQCB, or the USACE shall be mitigated by providing restoration at a minimum 3:1 restoration to impact ratio in areas for permanent impacts and 1:1 ratio for temporary impacts, unless otherwise approved in writing by CDFW or otherwise required by the RWQCB or USACE. A Habitat Mitigation and Monitoring Plan shall be prepared by the opportunity site project applicant and implemented for the proposed mitigation. The opportunity site project applicant shall obtain

[12] California Department of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Sacramento, CA.

written approval of this plan from CDFW, the RWQCB, or the USACE as applicable prior to any disturbance of stream or riparian habitat, wetlands, or other waters.

3.14 TRANSPORTATION AND CIRCULATION

This section describes existing and projected transportation conditions in Sausalito, including an analysis of potential impacts associated with adoption and implementation of the Housing Element programs. The transportation analysis has been prepared to satisfy CEQA requirements by W-Trans, with modeling support provided by Kittelson & Associates. The programmatic nature of the project was recognized in preparing the analysis, including assessments of whether it would conflict with adopted plans or policies addressing the circulation system including transit, roadway, bicycle and pedestrian facilities; result in hazards due to geometric design features; or result in inadequate emergency access to a site.

As required by the CEQA Guidelines, the primary determinant of significance related to transportation is focused on a quantitative assessment of vehicle miles traveled (VMT). As described below, this focus on VMT is a relatively recent change in CEQA, and relevant in that it has replaced the congestion-based level of service (LOS) metric that had previously been used.

In 2013, Governor Brown signed SB 743, requiring amendments to the CEQA guidelines for analyzing transportation impacts. Through this action, Public Resources Code Section 21099 (b)(1) directed the California Governor's Office of Planning and Research (OPR) to prepare updated CEQA guidelines for adoption by the Natural Resources Agency, including revised transportation significance criteria. PRC Section 21099 (b)(2) further specifies that upon certification of the updated CEQA guidelines, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment." The use of VMT as a CEQA significance threshold became mandatory on July 1, 2020. Accordingly, consistent with the requirements set forth in SB 743 and current CEQA guidelines, the transportation analysis completed for the Sausalito Housing Element programs focuses on the analysis of VMT rather than LOS.

All figures referenced are located at the end of the chapter.

3.14.1 EXISTING SETTING

Regional Context

Sausalito is located in southern Marin County alongside San Francisco Bay, just north of San Francisco and the Golden Gate Bridge. The city is bounded by unincorporated Marin County including the Marin City area to the north, the Golden Gate National Recreation Area to the south and west, and San Francisco Bay to the east. US 101 is a major freeway running through the western portion of Sausalito that functions as the primary north-south route

through Marin County, connecting major population centers to destinations to the south (including San Francisco) via the Golden Gate Bridge, as well as Sonoma County and northern California to the north.

Existing Roadway Network

This section describes the physical characteristics of the primary roadway network within and serving Sausalito. A map of key roadway and transportation facilities is shown in Figure 3.14-1.

Freeway

US 101 is Marin County's primary north-south highway, connecting to San Francisco via the Golden Gate Bridge and to Sonoma County in the north. Within Sausalito, US 101 is an eight-lane freeway located along the western edge of the city, with interchanges at North Bridge Boulevard (Marin City) at the northern end of the city, Alexander Avenue to the south of the city, Spencer Avenue, and a northbound-only interchange at Rodeo Avenue.

Arterial Streets

Bridgeway is the primary corridor serving the City of Sausalito, running north-south generally along the waterfront. The northern end of the corridor between the US 101 Marin City interchange and Napa Street is a four-lane median-divided street. From Napa Street southward to Richardson Street, the corridor includes three lanes (one lane in each direction plus a center turn lane). Speed limits range from 25 to 35 mph.

Richardson Street – Second Street – South Street include segments designated as minor arterials and link the southern end of Bridgeway to the Alexander Avenue corridor at the southern city limits which extends to US 101 near the Golden Gate Bridge. The streets include one travel lane in each direction and have 25 mph speed limits.

Collector Streets

Spencer Avenue – San Carlos Avenue include segments designated as collector streets and connect the US 101 freeway interchange at Spencer Avenue to Bridgeway. The streets include two lanes and have 25 mph speed limits.

Rodeo Avenue – Nevada Street include segments designated as collector streets and connect the US 101 northbound freeway interchange at Rodeo Avenue to Bridgeway. The streets include two lanes and have 25 mph speed limits.

Transit Service

Sausalito is served by several modes of public transportation, including regional and local buses and ferries, as described below. The transit routes serving Sausalito are shown in Figure 3.14-2.

Golden Gate Transit

Golden Gate Transit provides regional bus service to locations in Marin County, with connections to San Francisco, Sonoma County, and the East Bay. Route 130 operates along the Bridgeway and Alexander Avenue corridors within Sausalito, connecting downtown San Francisco to the San Rafael Transit Center. Route 130 operates with approximately one-hour headways in each direction (northbound and southbound) seven days a week. Golden Gate Transit also operates several routes along the US 101 corridor that stop at the Spencer Avenue bus pads, including Route 101 which runs daily at regular intervals between San Francisco and Santa Rosa, Route 132 which provides seven southbound morning and six northbound afternoon commute express buses between San Anselmo and San Francisco, and Route 150 which runs seven days a week at hourly intervals in each direction between San Francisco and the San Rafael Transit Center.

Many Golden Gate Transit bus stops include bicycle racks. Up to two bicycles can be accommodated on buses.

Marin Transit

Marin Transit provides several types of transit service within Marin County, offering routes primarily between and within communities along the US 101 corridor, with many including connections at the San Rafael Transit Mall. Two Marin Transit routes provide local service in Sausalito along Bridgeway between the northern city limits and the Ferry Terminal at Bridgeway/Bay Street. Route 17 provides daily service between the Sausalito Ferry Terminal and San Rafael Transit Center at 30-to-60-minute headways in each direction on weekdays, and hourly headways in each direction on weekends. Route 61 runs between the Sausalito Ferry Terminal and Bolinas, with five to six daily buses in each direction on weekdays and seven daily buses in each direction on weekends.

All Marin Transit vehicles include a lift or wheelchair ramp and can accommodate at least two wheelchairs, as well as racks that can accommodate at least two bikes.

Ferry Service

Golden Gate Transit operates ferry service between the San Francisco Ferry Terminal and the Sausalito Ferry Terminal near Bridgeway/Bay Street. On weekdays, there are seven daily ferries in each direction, and on weekends there are five daily ferries in each direction. In addition to Golden Gate Transit, the private operator Blue & Gold Fleet operates ferry service between the Sausalito Ferry Terminal and Pier 41 in San Francisco. Blue & Gold Fleet operates five daily ferries in each direction seven days a week.[1]

Marin Access Paratransit

Marin Access Paratransit offers a dial-a-ride, door-to-door, shared service for people with disabilities who are unable to use Marin Transit or Golden Gate Transit fixed route transit

[1] Blue and Gold Fleet, *Sausalito Ferry*, https://www.blueandgoldfleet.com/sausalito/, accessed May 2024.

service. Paratransit operates within three-quarters of a mile of fixed route service during the same hours of operation.

Call a Ride for Sausalito Seniors (CARSS)

Residents of Sausalito that are age 60 or older are eligible for the CARSS free transportation program, which offers rides provided by volunteers. The service is available within the broader Sausalito area on weekdays between 10:00 a.m. and 2:00 p.m.[2]

Marin Catch a Ride

Marin Catch a Ride is a discount taxi program overseen by Marin Transit that offers discounted rides by taxi and other licensed vehicles for people at least 80 years old, 60 and unable to drive, or who are eligible for ADA paratransit service.

Bicycle Facilities

Bicycle circulation in Sausalito is accommodated on a network of paths, bike lanes, designated bike routes, and supporting facilities. Several planned bike facilities have also been identified, including several intended to further strengthen north-south routes through town. A map excerpt from the Sausalito General Plan showing the city's existing and proposed bicycle network is provided in Figure 3.14-3.

The *Highway Design Manual*, Caltrans, 2020, classifies bikeway facilities into five categories:

- Shared Roadway (No Bikeway Designation) – no bikeway signage or striping is provided, although treatments such as edgeline striping and shoulders may be provided to enhance bicyclist access and safety.
- Class I Multi-Use Path – a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- Class II Bike Lane – a striped and signed lane for one-way bike travel on a street or highway.
- Class III Bike Route – signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- Class IV Bikeway – also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

The 2021 Sausalito General Plan Circulation Element identifies the following future bicycle facility improvements in the city.

[2] Call a Ride for Sausalito Seniors (CARSS), *Rider Information*, https://www.carss4you.org/copy-of-volunteer-information, accessed September 2022.

- Bridgeway Bikeway South: Policy CP-5.3.1 calls for installing new lane striping, signing, and other improvements to enhance the Bridgeway south corridor (Alexander Avenue, South Street, Second Street, Richardson Street, and Bridgeway) from the south city limits to Johnson Street as a largely Class III bike facility with Class II facilities where feasible, and to consider installation of a Class IV bike facility along portions of the corridor.
- Bridgeway Bikeway North: Policy CP-5.3.2 states that the city will consider modifying the street alignment on Bridgeway to include a Class IV bikeway, if feasible. The Bridgeway Bikeway North segment extends from Johnson Street to the northern city limits.
- North-South Family Bikeway: Policy CP-5.3.3 calls for the city to complete and enhance the existing off-street bike path to provide a largely Class I bike facility parallel to Bridgeway from Johnson Street, through the Marinship area, and to the northern city limits.
- North-South Greenway: Policy CP-5.3 seeks to link Sausalito to the North-South Greenway, which is a planned countywide bicycle and pedestrian corridor running from the Golden Gate Bridge to northern Novato. Within Sausalito, gaps in the North-South Greenway exist including off-street path segments on Bridgeway between Donahue Street and Johnson Street, along the bayfront between Johnson Street and the ferry terminal, and on Bridgeway between Princess Street and Richardson Street.

The *Caltrans District 4 Bike Plan* (2018) includes recommendations for facilities to enhance bicycle safety and access along and across state highway facilities. Near Sausalito, it identifies implementation of bike lanes on Donahue Street to improve bicycle connectivity under US 101, connecting the Marin City area to the Mill Valley Sausalito Path east of Bridgeway.[3]

The City of Sausalito recently constructed enhancements to improve bicycle circulation and safety at the Bridgeway/Gate 6 Road intersection. The project included adding bicycle detection, pavement rehabilitation, and improvements to curb ramps and crosswalk bicycle/pedestrian waiting areas.

Pedestrian Facilities

Pedestrian facilities include components such as sidewalks, trails, crosswalks, pedestrian signals, and pedestrian crossing warning devices. In the flatter areas of Sausalito where pedestrian volumes are highest, including along the Bridgeway and Caledonia Street corridors, commercial districts, schools, and recreational areas, networks of sidewalks and multi-use pathways are typically available to accommodate pedestrian travel. In the Marinship area most public streets have sidewalks on one or both sides of the roadway,

[3] California Department of Transportation (Caltrans), *Caltrans District 4 Bike Plan for the San Francisco Bay Area*, 2018.

though there are some exceptions such as the northern portion of Marinship Way that lacks pedestrian facilities. Sidewalks are generally present in areas where recent development or redevelopment activity has occurred.

Sidewalks and pathways are more limited in the city's mountainous residential areas though several pathways and stairways do extend into these areas, including connections to passive recreation and open space areas to the west of the city.

3.14.2 REGULATORY SETTING

State

Senate Bill 743

SB 743, signed into law in 2013, required CEQA lead agencies to shift away from using traditional congestion-based level of service standards and automobile delay to determine significant traffic impacts. As a result of SB 743, the CEQA guidelines have been updated to reflect VMT as the primary metric for evaluating transportation impacts. Pursuant to Public Resources Code Section 21099(b)(2), "automobile delay, as described solely by level of service of similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment." The *Technical Advisory on Evaluating Transportation Impacts in CEQA*, California Governor's office of Planning and Research (OPR), December 2018, referred to herein as the "OPR Technical Advisory," provides details on VMT assessment, methodologies, and suggested metrics. It is important to note that while jurisdictions including Sausalito may continue to maintain LOS standards for non-CEQA planning purposes, effects on LOS are no longer considered an environmental impact.

California Department of Transportation (Caltrans)

Caltrans has not established formal VMT significance thresholds, though in May 2020 released the *VMT-Focused Transportation Impact Study Guide* (TISG) that refers to guidance provided in the OPR Technical Advisory, which recommends VMT per capita thresholds 15 percent below existing city or regional levels. The Caltrans TISG also refers to OPR Technical Advisory guidance on the types of projects that can be presumed to have a less-than-significant transportation impact. The TISG reiterates that automobile delay is no longer considered a significant impact on the environment within CEQA transportation analysis, indicating that the agency's Local Development-Intergovernmental Review (LD-IGR) program will focus on VMT consistent with the CEQA guidelines.

Regional

Transportation Authority of Marin (TAM)

TAM is designated as the congestion management agency for Marin County. TAM is responsible for managing a variety of transportation projects and programs in Marin County, receiving federal, State, regional, and local funds, and working closely with all eleven cities and towns as well as the County. Historically, TAM was responsible for administering a countywide Congestion Management Program, which included congestion-based level of service performance requirements for designated roadways in the County. Within and near Sausalito, these included US 101 and Bridgeway.

On April 28, 2022, the TAM Board of Commissioners unanimously directed TAM staff to initiate the process of opting out of the CMP and focus future efforts on the development of a Comprehensive Transportation Plan. In August 2022, TAM notified the Metropolitan Planning Commission (MTC) that it had received sufficient support from Marin County jurisdictions to formally opt out of the CMP. With this change, CMP requirements pertaining to analysis of consistency with LOS-based metrics no longer apply. One of the reasons cited by TAM for this change is to address inconsistencies with CEQA, which no longer considers traffic congestion (as measured by LOS) to constitute a significant environmental impact, instead requiring assessment of VMT.

Local

Sausalito General Plan

The General Plan contains the following policies and programs in its Circulation and Parking Element that are relevant to the project:

Circulation and Parking Element

Policy CP-1.1 Street Network. Emphasize maintenance and improvements to the street network that will not require construction or major roadway widening.

Program CP-1.2.1 Commuter Through Traffic. Investigate methods to minimize commuter through traffic in residential areas including the consideration of expanding existing regional bike facilities through Sausalito.

Program CP-1.3.1 On-Street Parking Restrictions. Consider restricting on-street parking on primary arterial roadways in order to maintain the desired VMT standards and provide safer bicycling facilities.

Program CP-1.4.1 VMT Standard. Transition to a citywide VMT standard when considering traffic impacts of new development, in keeping with CEQA requirements.

Program CP-1.4.2 VMT Transition. Fund and maintain a program that supplies an annual Traffic Report Card with both level of service and vehicle miles traveled data throughout the LOS-to-VMT Transition process.

Policy CP-2.5 Residential On-Street Parking. Manage the supply of on street parking in residential areas.

Program CP-2.5.1 Residential Parking Goals. Develop goals for parking on residential streets that include preserving neighborhood character, promoting circulation safety, and potentially managing household delivery and home health services.

Policy CP-3.1 Public Bus Service. Encourage the maintenance of a safe, efficient, and reliable bus service.

Program CP-3.1.2 Enhance Bus Stops. Work with the GGT and Marin County Transit District (MCTD) to provide bus stop amenities that facilitate greater use by Sausalito transit riders.

CP-3.1.3 Direct Commuter Service. Work with GGT and MCTD to provide direct (no transfer) commuter service for people employed in Sausalito.

Policy CP-3.2 Alternative Transportation. Improve the efficiency of the existing transportation system and reduce the reliance on the private automobile by emphasizing alternative transportation modes.

Program CP-3.2.1 Shuttle Service. Explore alternative forms of transit service, including recommendations from the Low Emissions Action Plan and Climate Action Plan, such as shuttle service from remote parking sites and local shuttle bus service throughout the community.

Program CP-3.2.2 School Bus System. Promote school bus usage by school systems and families.

Program CP-3.2.3 Information on Transit. Work with local businesses to provide information on transit alternatives for distribution at local stores and hotels.

Program CP-3.3.1 Multimodal Considerations. Identify and implement best practices to link public transit to rideshare and micromobility platforms.

Program CP-4.1.3 Bus/Ferry Connections. Encourage the transit district to improve the ferry and bus connection points as well as timing of the schedules.

Program CP-4.1.5 Multimodality. Improve rideshare, bicycle parking, and micro-mobility staging near the ferry terminal.

Program CP-4.2.1 Small-Craft Shared Mobility. Consider the feasibility of small-craft shared mobility platforms in Sausalito.

Policy CP-5.1 Bicycle Master Plan. Plan, design, implement, and maintain bicycle infrastructure in Sausalito according to the Bicycle Master Plan.

Program CP-5.1.3 Local Bicycle Trips. Promote local bicycle trips by Sausalito residents and workers when updating the Bicycle Master Plan, including encouraging trips to commercial areas of the city.

Policy CP-5.2 Bicyclist Safety. Provide a safe environment for bicycling along city streets and bicycle trails.

Program CP-5.2.2 Safe Routes to School. Support the Safe Routes to School Program.

Program CP-5.3.1 Bridgeway Bikeway South. Consider installation of a Class IV Bike facility along portions of Bridgeway. Install new lane striping, signing, and other improvements to enhance the Bridgeway corridor (Alexander Avenue, South Street, Second Street, Richardson Street, and Bridgeway) from the south city limits to Johnson Street as a largely Class III Bike facility with Class II facilities where feasible.

Program CP-5.3.2 Bridgeway Bikeway North. Consider modifying the street alignment on Bridgeway to include a Class IV Bikeway, if feasible.

Program CP-5.3.3 North-South Family Bikeway. Complete and enhance the existing off-street bike path to provide a largely Class I Bike facility parallel to Bridgeway from Johnson Street, through the Marinship area, and to the northern city limits.

Program CP-5.3.5 Bicycle Parking Standards. Amend the Zoning Ordinance to require bicycle parking facilities and standards for new development, redevelopment, and/or intensification of existing developed sites.

Policy CP-5.4 Bridgeway Bikeway South: Long-Term Solutions. Investigate and study long-term solutions to either ameliorate or bypass the most constricted and/or congested conditions at Alexander Avenue, South Street, and Bridgeway south of the downtown.

Policy CP-5.5 Bicycle Route Design and Standards. Ensure that all existing and proposed bike routes, lanes, paths, and intersections are compliant with the most up-to-date standards to reduce conflicts between bicyclists, vehicles, and pedestrians, promote safety, and encourage the use of nonmotorized travel modes.

Program CP-5.6.2 South Connector Trail. Work with ABAG and the San Francisco Bay Trail Project to provide a connector trail from the Ferry Terminal south to East Fort Baker.

Program CP-5.6.3 Regional Bike Route Alternative. Work with the County of Marin, GGNRA, Caltrans, GGT, MCTD, and other relevant agencies to establish an alternate north-south connector bike route to bypass the urbanized areas of Sausalito and alleviate bicycle through-traffic on Bridgeway, particularly in the south corridor.

Program CP-5.7.1 Priority Segments. Implement a study of all existing stair systems and public easements to identify the priority stair connectors that can be utilized as emergency exits and implement improvements to these systems.

Program CP-5.7.2 Connector Segments. Consider purchasing connector segments to complete the pedestrian trail and pathway system.

Program CP-5.7.3 Access Easements. Require new projects, as appropriate, to dedicate access easements.

Program CP-5.7.4 Paper Streets. Investigate the use of existing unimproved portions of public rights-of-way as new pathway connectors.

Program CP-5.7.5 Private Encroachments. Identify private encroachments onto trail and pathway easements and restore those trails and pathways wherever possible.

Policy CP-5.8 Pedestrian Safety. Provide a safe walking environment along city streets and pathways.

Program CP-5.8.1 Coordination with School District. Coordinate with the School District and the Transit Agency of Marin to identify Safe Routes for children on the way to school.

Policy CP-5.9 Accessibility. Ensure city sidewalks and pathways are accessible for people of all abilities.

Program CP-5.9.1 Review of New Projects. Continue to review all projects, including installations of ramps and curb cuts, for compliance with accessibility standards in accordance with Title 24 of the California Administrative Code and the Americans with Disabilities Act of 1991.

Program CP-5.10.1 Complete Streets Implementation. Implement a complete streets policy to include multi-modal aspects of access improvements, including but not limited to bicycle access, pedestrian improvements, and accessibility improvements, to all capital projects wherever practical.

Policy CP-5.11 Development Plan Review. New development and substantial remodels in the Marinship should give special attention to the establishment and enhancement of pedestrian and bicycle pathways.

Program CP-5.11.1 Marinship Pedestrian Incentives. Prioritize the creation and maintenance of pedestrian and bicycle paths as part of new development or substantial remodeling projects in the Marinship.

Policy CP-6.1 Development Requirements. Require developers of new and redevelopment projects to contribute to the cost of needed traffic and transit improvement.

Program CP-6.1.2 Maximize Transit Ridership. During review of proposed development, encourage improvements that will maximize ridership of public transit, such as those recommended by the Low Emissions Action Plan and Climate Action Plan.

Program CP-6.3.1 Circulation Coordination. Consider a strategy to improve circulation on public and privately-owned rights-of-way in the Marinship as part of a potential Marinship Infrastructure Needs Analysis.

Program CP-6.3.2 Pedestrian/Bicycle Marinship Circulation. Encourage development of bicycle and pedestrian-oriented circulation that does not interfere with the economic sustainability of the working waterfront maritime and industrial neighborhood character of the Marinship.

Policy CP-7.4 Equitable Transportation. Integrate equity into Sausalito's circulation and parking projects, working with Caltrans and other agencies to strive towards meeting the transportation needs of all households and community members, including those with limited mobility and/or travel options. Explore ways to increase the scope of equitable transportation in Sausalito.

Program CP-7.4.1 Transit Improvements. Work with Marin Transit, Caltrans, and other relevant organizations to better connect Sausalito residents to their workplaces and Sausalito workers to their residences, including optimizing transit routes and schedules. This strategy should promote car-free transportation and it may include data collection and analysis improvements.

Program CP-7.4.2 Pedestrian Improvements. Promote safe pedestrian walkways throughout the city, including paths, stairways, sidewalks, and crosswalks. This may include maintenance as well as the creation of new walkways where appropriate.

Program CP-7.4.3 Innovative Transportation. Consider support for existing innovative car-sharing (such as CARSS) and new transportation methods that will increase equitable access to the city for members of the Sausalito community, particularly those with lower incomes or mobility issues.

Health, Safety, and Community Resilience Element

Policy HS-2.4 Access for Emergency Vehicles. Provide and maintain adequate access for emergency vehicles and equipment, particularly firefighting equipment. Proactive measures may be necessary to encourage efficient measures, including ensuring adequate width of roadways, and not siting critical egress and ingress within flood zones to the extent possible.

Program HS-2.4.1 Street Encroachment Permit Process. Maintain a temporary street encroachment permit process so that construction and other large pieces of equipment or vehicles occupying the public right-of-way may be regulated.

Program HS-2.4.2 Street Frontage Improvement. Require frontage improvements when private development is proposed and where neighborhood compatibility concerns can be addressed (see policy CP-2.5).

3.14.3 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, except as provided in Public Resources Code Section 21099, the proposed project would have a significant impact related to transportation if it would:

- Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b);

- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

Vehicle Miles Traveled Thresholds

CEQA Guidelines Section 15064.3, subdivision (b) pertains to the use of VMT as a significance threshold. As described in the methodology section that follows below, residential projects are analyzed using a home-based VMT per capita performance metric. The OPR Technical Advisory states that the VMT significance threshold for residential projects should be established using the citywide or regional average VMT per capita, with the region in this case defined as the nine-county Bay Area. Many incorporated cities establish their residential VMT significance threshold using an intermediate geographical area based on the countywide average instead of the citywide or regional average. The countywide average was used to determine the residential VMT threshold for the proposed project for two key reasons. First, the proposed project affects sites throughout the City of Sausalito, so comparing its VMT effects to a citywide average could make results difficult to discern; using the Marin countywide average provides a much clearer comparison of how Sausalito's vehicle travel patterns relate to its surrounding area. Second, comparing the project's residential VMT to the Bay Area regional average is overly-conservative as the regional average heavily "weights" travel patterns occurring in major metropolitan areas including San Francisco and Oakland that have especially robust transit systems; again, using the Marin countywide average provides a much clearer and more appropriate comparison to the surrounding area's physical environment and land use context. Per OPR Technical Advisory guidance, a residential project exceeding a level of 15 percent below the existing average VMT per capita is considered to have a significant transportation impact. The existing average Marin countywide VMT per capita is 14.8 miles, as reported from the TAMDM model used in this analysis, which has a base year of 2019 (the most current data available). The applicable residential VMT significance threshold is therefore 15 percent below this value, or 12.6 VMT per capita.

For the purposes of this analysis, the nonresidential components of the project that would be associated with mixed-use development on potential housing sites was conservatively treated as employment-based or office uses (this is conservative because retail uses occurring at the sites would be "screened" from VMT analysis since they would be considered local-serving and presumed to have a less than significant VMT impact, whereas employment/office uses are analyzed for their VMT-generating characteristics). The OPR Technical Advisory indicates that the VMT significance threshold for employment/office projects should be established using the regional average home-based commute VMT per employee. The existing regional average VMT per employee is 18.1 miles as reported from

the TAMDM model used in this analysis. The applicable VMT significance threshold for employment-based uses is therefore 15 percent below this value, or 15.4 VMT per employee.

Methodology

As described in Chapter 2, Project Description, the potential housing sites identified in the Housing Element update are located throughout Sausalito. Including potential ADUs as well as potential units associated with State Density Bonus provisions and SB 9, the combined sites could accommodate an estimated total of 1,147 new residential units. The Project would also accommodate an estimated net increase of up to 5,171 square feet of commercial space on several housing sites; this net increase is comprised of approximately 20,108 square feet of new commercial uses and 14,937 square feet of existing commercial uses that would be demolished and replaced by housing. In total, the 1,147 potential residential units and 5,171 added square feet of commercial uses are evaluated as the Project in the transportation analysis.

Vehicle Miles Traveled Methodology

This section provides a background on VMT and describes the methodology used to assess the potential VMT impacts that could result from the proposed Amended Housing Element.

VMT Background

VMT represents a number of daily miles driven and can be expressed in different ways including total VMT, which is an aggregate value measured in miles, and VMT per capita, which is a performance metric measured in the number of miles driven per person. Many factors affect VMT including the average distance residents commute to work, school, and shopping, as well as the proportion of trips that are made by non-automobile modes. Areas that have a diverse land use mix and ample facilities for non-automobile modes of travel, including transit, tend to generate lower VMT than auto-oriented suburban areas.

TAMDM Model

Forecasts of regional travel by various modes as well as regional average VMT per capita values are determined using the Transportation Authority of Marin Demand Model (TAMDM). The travel model is a set of mathematical procedures and equations that represent the variety of transportation choices that people make, and how those choices result in trips on the transportation network. The TAM regional travel model is an activity-based model that is a member of the Coordinated Travel – Regional Activity-Based Modeling Platform (CT-RAMP) family of models. TAMDM is nested within the nine-county Bay Area Travel Model Two activity-based model maintained by the Metropolitan Transportation Commission (MTC). The MTC version of the CT-RAMP features a very detailed spatial system including an all-streets transportation network with 4,800 Transportation Analysis Zones (TAZs) and almost 40,000 Micro-Analysis Zones (MAZs). The model also utilizes 6,200 transit access points (TAPs).

The most recently updated version of the TAM regional activity-based travel demand model is used to identify the VMT generated by land uses in Sausalito, Marin County, and the entire Bay Area region. For the Sausalito Amended Housing Element analysis, the 2019 version of the TAMDM that includes the SMART commuter rail service, and the 2040 version that incorporates changes envisioned by long-range land use plans throughout the County, were used to produce VMT estimates. The TAMDM requires land uses to be defined for each geographic area in the region, i.e., the MAZ. The model land use inputs include numbers of households, persons and their attributes, employees by employment category, as well as enrollment at schools. TAMDM had defined a 2040 land use forecast for the RTP/SCS based on regional economic forecasts. This forecast was assumed to be generally consistent with the allowable land uses in the Sausalito General Plan.

The transportation modeling completed for the Amended Housing Element includes all of the sites identified in the Housing Element, which contain a total of 1,147 potential residential units. The modeling also includes a net increase of 5,171 square feet of commercial space that could be accommodated on the housing sites. These land use changes were allocated in the TAMDM to the Sausalito MAZs encompassing the housing sites.

The land use and population changes associated with the proposed Amended Housing Element were compiled into two project-specific model runs, one of which was performed for base year 2019 plus project and the other of which was performed for the forecast year 2040 plus project. The year 2019 was used as a base year as that is the year with the most recent traffic data available. From these model runs as well as the "no project" 2019 and 2040 runs, VMT per capita and VMT per employee metrics were extracted. The residential VMT per capita metrics include all home-based trips made by residents but do not include trips visiting residences (e.g., non-home-based trips made by deliveries and visitors). The citywide average VMT per capita is calculated by summing the vehicle mileage (excluding trips made by transit, bicycle or walking) for all trips made by Sausalito residents and dividing by the city's population. VMT per employee estimates are based on home-based work VMT (i.e., the VMT generated by employee commute travel) divided by the number of employees. The same approach is used for determining the VMT performance metrics for the County of Marin and Bay Area. VMT estimates for the 2019 baseline modeled conditions are shown in Table 3.14-1.

TABLE **ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.**-1: TAMDM DEMOGRAPHICS AND VMT, 2019 BASELINE CONDITIONS

CATEGORY	SAUSALITO	MARIN COUNTY	BAY AREA
Residential VMT			
Home-Based VMT	111,668	3,857,629	98,849,727
Population	7,403	261,431	7,891,837
VMT per Capita	15.1	14.8	12.5
Employment VMT			
Employment Home-Based (Commute) VMT	182,445	2,820,978	66,834,439
Employees	7,052	121,196	3,694,811
VMT per Employee	25.9	23.3	18.1

NOTE: VMT = VEHICLE MILES TRAVELED; REPORTED VALUES ARE MEASURED IN MILES.

Source: TAMDM, Kittelson & Associates, W-Trans, 2024

VMT Performance Metrics

The VMT performance metrics applied in the analysis of the Amended Housing Element are consistent with guidance contained in the OPR Technical Advisory. Potential impacts associated with residential uses were analyzed by measuring VMT per capita, while potential impacts associated with nonresidential uses were assessed using VMT per employee. Further information on the applied VMT significance thresholds is provided in the Thresholds of Significance section above.

Screening

CEQA allows for the use of screening thresholds or criteria to identify certain types of projects that can be expected to cause a less-than-significant impact without needing to conduct a detailed analysis (CEQA Guidelines sections 15063(c)(3)(C), 15128, and the environmental checklist included in CEQA Appendix G). The OPR Technical Advisory suggests that lead agencies use such criteria to "screen out" VMT impacts for qualifying projects and includes descriptions of several screening types. Following are screening criteria identified in the OPR Technical Advisory that may pertain to residential projects:

- Small Project Screening: Projects that generate or attract fewer than 110 trips per day may be presumed to have a less-than-significant impact.
- Map-Based Screening: Projects located within areas that have been mapped by jurisdictions as being low-VMT areas, as evidenced through quantified VMT data. While such VMT data is available from the TAMDM model, the City of Sausalito has thus far not produced formal VMT screening maps, so this measure does not currently apply.
- Screening of Sites Near Major Transit Stops: Projects located within one-half mile of a major transit stop as defined in Public Resources Code 21064.3. In Sausalito the only location that currently qualifies for major transit stop screening is the area within one-half mile of the ferry terminal.

- Local-Serving Retail: Unlike regional retail, local-serving retail development typically redistributes shopping trips rather than creating new trips. The OPR Technical Advisory states that "lead agencies generally may presume such development creates a less-than-significant transportation impact." Based on OPR guidance, retail projects less than 50,000 square feet in size are typically considered to be local-serving.
- Affordable Residential Development Screening: Projects containing 100 percent affordable residential development in infill locations.

In addition to the screening parameters listed above, small nonresidential components of sites containing mixed uses may not require quantitative VMT analysis. The OPR Technical Advisory states that lead agencies may evaluate each component of a mixed-use project independently or may consider only the project's dominant use. For the proposed project, residential uses are inherently the dominant use, with nonresidential uses generally comprising only a small portion of the overall square footage. While the VMT modeling that was performed for the Amended Housing Element includes all potential project changes to nonresidential uses, when analyzing individual development projects during the entitlement process, it would be reasonable for the city to focus only on the residential VMT component, or establish a level at which minor commercial components of residential projects need not be assessed (for example, projects where nonresidential uses generate less than 20 percent of the overall daily traffic generated by the project).

For the purposes of the Amended Housing Element VMT analysis, all potential housing units and nonresidential uses that could occur on designated sites were included in the VMT modeling results. No sites were excluded from the analysis under the presumption that they would qualify for VMT screening. This approach was used to ensure a conservative analysis, and in recognition that the potential for VMT screening is best assessed at an individual development level during the entitlement process when project-specific details are known.

Non-CEQA Issue – Traffic Congestion

As previously discussed in this chapter, LOS and congestion-related measures are no longer considered in CEQA, and accordingly have not been analyzed as part of the Amended Housing Element EIR. The following qualitative discussion of potential impacts to congestion is provided for informational purposes.

The proposed project includes the potential development of more housing units than were evaluated in LOS analyses conducted as part of the 2020 General Plan update (contained in Appendix F of the 2020 City of Sausalito Revised General Plan EIR). The General Plan traffic analysis indicates that under future p.m. peak hour buildout volumes at ten key signalized intersections along the Bridgeway corridor, traffic operation is projected to be LOS C or better, which is one or more letter grades above the city's LOS D standard specified in General Plan Policy CP-1.6. This suggests that, from a traffic operation perspective, these intersections have reserve capacity to accommodate further increases in vehicular traffic

before being at risk of exceeding the LOS D standard. Despite this reserve capacity, the proposed Amended Housing Element identifies several potential housing sites directly along the Bridgeway corridor, and the potential that one or more signalized intersections would drop below LOS D at buildout of the General Plan and sites identified in the Housing Element Update does exist if no corrective actions were taken. However, the City of Sausalito will continue to assess traffic impacts outside of CEQA as part of the entitlement process and retains the authority to require individual development projects to complete traffic improvements needed to maintain acceptable LOS. Such measures would be required by imposing conditions of approval or similar mechanisms, rather than through CEQA-based mitigation measures.

3.14.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES

Impact 3.14-1 Implementation of the Amended Housing Element would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Auto Circulation

The Amended Housing Element would be substantially consistent with the Sausalito General Plan's policies regarding auto circulation. The General Plan Circulation and Parking Element contains policies and programs intended to maintain and improve the city's roadway network without major roadway widening (Policy CP-1.1), develop a VMT standard (Program CP-1.4.1), include Complete Streets multimodal improvements in capital projects wherever possible (Program CP-5.10.1), and consider a strategy to improve circulation in the Marinship (Program 6.3.1). Policy CP-6.1 requires developers to contribute to the cost of transportation improvements. These policies and programs would help manage the roadway needs created by development of the housing sites identified in the Housing Element.

General Plan Policy CP-1.6 calls for the city to maintain an LOS D standard for signalized intersections during the weekday p.m. peak hour except on Johnson, Bay, and Princess Streets; however, the Amended Housing Element would amend this policy to clarify that shall apply to the extent that the City can feasibly make improvements, such as where existing right-of-way can feasibly accommodate improvements to maintain LOS "D" or where right-of-way can be obtained without requiring loss of dwelling units or commercial structures. Note that while LOS is no longer considered in CEQA assessments, Sausalito still maintains this LOS D standard, and may continue to require the preparation of traffic impact studies for development projects in the same manner that is currently applied. Any circulation constraints or deficiencies that are identified in such studies, including measures needed to maintain roadway performance, would typically be addressed as conditions of approval rather than CEQA mitigation measures. The Proposed Plan would not preclude traffic impact studies from being prepared and would not preclude the city from requiring transportation

improvements to be completed by development projects (including modifications to improve traffic operation, access, and bicycle, pedestrian, and transit improvements), so would not be in conflict with Policy CP-1.6.

Bicycle and Pedestrian Circulation

The proposed Amended Housing Element would be substantially consistent with policies and programs in the Sausalito General Plan pertaining to bicycle and pedestrian facilities. The General Plan identifies several policies and programs intended to improve facilities for non-auto modes and promote non-auto travel. These include improving and maintaining bicycle infrastructure according to the Bicycle Master Plan (Policy CP-5.1), supporting the Safe Routes to School program (Program CP-5.2.2), and implementation of the Bridgeway and North-South Family Bikeways (Programs CP-5.3.1 through CP-5.3.3 and Policy CP-5.4). Regarding pedestrian facilities, the General Plan calls for improvements to the city's existing stair systems and public easements (Program CP-5.7.1), establishment of new connector segments through potential city purchases (Program CP-5.7.2) and requiring development projects to dedicate access easements (Program CP-5.7.3), ensuring that city sidewalks and pathways are accessible for people of all abilities (Policy CP-5.9), and promoting safe pedestrian walkways throughout the city (Program 7.4.2). The proposed project would not conflict with these policies and programs.

General Plan Policy CP-5.11 requires new development and substantial remodels in the Marinship to establish and enhance pedestrian and bicycle pathways, and Program CP-5.9.1 calls for the city to continue requiring all development projects to be compliant with accessibility standards. Program CP-5.11.1 further calls for creation and maintenance of pedestrian and bicycle paths as part of development projects in the Marinship. The proposed project would not conflict with these policies and programs.

Individual development projects proposed on any of the sites identified in the proposed Amended Housing Element would be subject to review by the City of Sausalito during the entitlement process to ensure that adequate pedestrian and bicycle facilities are provided, and to confirm that the projects are consistent with the General Plan policies and programs outlined above. As appropriate, the city would identify required improvements such as (for example) internal and offsite connections, completion of planned bicycle facilities along project frontages, provision of pedestrian connections to bus stops, implementation of crossing improvements including accessible curb ramps, and provision of bike parking.

Public Transit System

With respect to policies and programs relating to Public Transit, the Sausalito General Plan encourages the maintenance of safe and efficient bus services (Policy CP-3.1) and improvement of ferry and bus connection points by the transit district (Program CP-4.1.3). Program CP-3.1.2 calls for the city to coordinate with transit agencies to provide bus stop

amenities that facilitate greater use by Sausalito riders, Program CP-3.2.1 calls for exploring alternative forms of transit including shuttles, Program 3.2.2 addresses promoting school bus usage, and Program 7.4.1 includes working with transit and other agencies to better connect Sausalito residents to workplaces and vice versa. Program CP-6.1.2 indicates that during review of proposed development, the city should encourage improvements that will maximize public transit ridership.

Individual development projects proposed on any of the housing sites identified in the Amended Housing Element would be subject to review by the City of Sausalito and applicable transit agencies to ensure that adequate access to available transit would be provided. During these project-specific reviews, overseeing agencies would identify required improvements such as (for example) bus pullouts, transit shelters, and sidewalks or pedestrian paths connecting to transit stops.

Because the proposed project would not conflict with policies, plans, or programs regarding roadways, bicycle and pedestrian facilities, and public transit, and because individual developments will be reviewed through the entitlement process to determine necessary transportation improvements, the impact is considered to be ***less than significant***.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Impact 3.14-2 Implementation of the Amended Housing Element would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (a).

With implementation of the proposed Amended Housing Element, the residential VMT per capita in the City of Sausalito is projected to be 13.2 miles, which is a reduction from existing levels. The applicable significance threshold of 12.6 VMT per capita would, however, be exceeded by approximately 4.8 percent overall. Based on review of VMT per capita results at smaller geographic levels (the micro-analysis zone—or MAZ—level in the TAMDM model), some potential housing locations may exceed significance thresholds by as much as 51 percent.

The 23.5 VMT per employee associated with Housing Element sites containing added nonresidential uses would also be lower than existing citywide levels. VMT per employee would, however, exceed the applicable significance threshold of 15.4 VMT per employee by approximately 52.8 percent overall.

Because buildout of sites associated with the proposed Amended Housing Element would fall short of meeting VMT significance thresholds for residential and nonresidential uses, the project would be considered to have a ***significant impact*** on VMT.

Table 3.14-2 summarizes the VMT efficiency metrics assessed for the project.

TABLE **ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.**-2: VMT ANALYSIS SUMMARY

	RESIDENTIAL VMT PER CAPITA	NONRESIDENTIAL VMT PER EMPLOYEE	TOTAL VMT
Threshold of Significance			
Applicable Geographic Area	Countywide	Regional	-
A. Existing	14.8	18.1	-
B. 15% below Existing (Threshold)	12.6	15.4	-
City of Sausalito			
C. Existing	15.1	25.9	275,631
Proposed Project			
Project Area Assessed	City of Sausalito	Affected MAZs[1]	City of Sausalito
D. Existing plus Project	13.2	23.5	280,407
E. 2040 plus Project	16.5	23.5	325,020
Impact Determination			
Above Threshold?	Yes (+4.8%)	Yes (+52.8%)	-
Impact[2]	Significant	Significant	-

NOTES:
1. TAMDM MICRO ANALYSIS ZONES (MAZS) IN SAUSALITO THAT CONTAIN HOUSING ELEMENT SITES WITH INCREASES IN NONRESIDENTIAL USES.
2. A SIGNIFICANT IMPACT OCCURS IF THE RESULTS SHOWN IN ROW D ARE GREATER THAN THE THRESHOLDS SHOWN IN ROW B; VMT VALUES ARE REPORTED IN MILES.

Source: TAMDM, Kittelson & Associates, W-Trans, 2024

Level of Significance before Mitigation

Potentially Significant

Mitigation Measures

MM 3.14-2a Residential projects that do not include any retail space (all-residential projects) proposed on Inventory Sites or Opportunity Sites in the Amended Housing Element shall:

- Require the individual project developer to participate in a VMT Exchange whereby developers can pick a VMT mitigation action from an approved list and either pay for someone else to implement that action or do it themselves. These actions shall include financial incentives for individuals, contributions to funds for identified capital improvement projects, and contributions to funds for enhancing transit services.

- Prior to issuance of a building permit, require the individual project developer to submit, in writing, proof of contribution to a VMT Exchange, including disclosure of how the funding will be used.

- Alternatively, an individual project developer may make a fair share contribution to the "Regional Transportation Planning (RTP) project - Express Bus/Service Expansion from the Golden Gate Bridge, Highway and Transportation District." This regional transit project proposes to implement improvements to existing express bus service along Highway 101 and I-580, including frequency upgrades (20–40-minute peak headways on routes 4, 18, 27, 101, 40X and 56X). Increased frequency for bus service along the Project area could encourage public transit ridership, resulting in lower VMT.

MM 3.14-2b Nonresidential or mixed use projects proposed on Inventory Sites or Opportunity Sites in the Amended Housing Element shall implement a Transportation Demand Management Program (TDM Program). The TDM Program shall include strategies, incentives, and tools to provide opportunities for employees and patrons to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to non-residential uses to the individually proposed project.

The TDM Program shall include:

1. TDM 1/Encourage Alternative Modes of Transportation (Public Bus and Vanpool) – The individually proposed project shall encourage alternative modes of transportation use by providing monetary incentives to employees and patrons such as:

    - Discounted goods or services with proof of a same-day transit ticket or registered transit card (the regional fare payment method).

    - Transit and/or Multi-Modal Subsidy, providing pre-tax commuter benefits for employees.

    - Marketing and outreach campaign for transit usage and ridesharing.

    - Provision of fair-share on-site and/or off-site improvements to bus stops within ¼-mile of an individually proposed project. Such

improvements may include the provision of new or improved lighting, new benches and overhead canopies, additional bench capacity if needed, new or expanded bike racks, or similar physical improvements.

2. TDM 2/Encourage Carpools and Zero-Emission Vehicles – Individually proposed projects shall provide incentives that would encourage carpooling and zero-emission vehicles as a means for sharing access to and from the site, including the following:

    - Provide incentives for carpools or zero-emission vehicles, including preferential parking with the number of parking spots in excess of applicable requirements, reduced or subsidized parking costs, or other discounts/benefits.

    - For projects that include dedicated parking areas with more than ten (10) parking spaces provided, provide one (1) parking space with an electric vehicle charging station.

3. TDM 3/Encourage Active Transportation – The Project shall include features which enhance access for bicyclists and pedestrians including the following:

    - Provide bicycle parking in excess of applicable code requirements.

    - Coordinate bike pools and walk pools.

    - Provide sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the project site.

Employers shall report the efficacy of its trip reduction program to the City of Sausalito. The "employer program manager" – the employee with policy and budget authority who is responsible for the implementation of the employer trip reduction program or employer trip reduction plan and for fulfilling the requirements of this rule – shall conduct an employee trip survey using a uniform survey form prepared by the Marin County CMA. A summary of the trip results shall be submitted annually to the City of Sausalito.

Level of Significance after Mitigation

Significant and Unavoidable

Implementation of this mitigation measure would reduce the VMT impacts associated with future development projects, but quantifying the reduction would be difficult as some of these measures may not be feasible depending on the type and location of project proposed. There are two important elements that introduce uncertainty as to whether VMT reductions can consistently be achieved. First, the proposed project is programmatic in nature. Specific development plans defining the size, configuration, and characteristics of potential future development projects could potentially result in VMT projections that differ from those reflected in the TAMDM modeling completed for this analysis, but site-specific information about future development projects is not available at this time. Because VMT performance is sensitive to these factors, it is not currently possible to conclusively determine VMT performance metrics and the effectiveness of project-level VMT reduction strategies for individual sites or for the Housing Element sites as a whole. Second, there is uncertainty about the ability for development projects on all project sites to achieve VMT reductions—particularly those projects on sites where it is infeasible to provide new or more frequent transit service and few alternative VMT reduction strategies are viable, at least until such time that VMT mitigation fee programs, banks, or exchanges can be established.

The program-level VMT impact described above does not preclude the finding of less-than-significant impacts for future development projects that achieve VMT levels that are below applicable thresholds of significance, including those that qualify for VMT screening as defined in OPR Technical Advisory or future VMT policies adopted by the City of Sausalito. It is likely that at least some of the sites identified in the Amended Housing Element would meet one or more of the following VMT screening parameters:

- Small projects generating few daily trips based on ITE trip generation rates
- Local-serving retail and service uses
- Projects containing 100 percent deed-restricted affordable housing
- Projects within one-half mile of the Sausalito Ferry Terminal

Given the inability to assure that the residential VMT per capita and employment VMT per employee associated with the proposed project would be reduced below applicable VMT significance thresholds despite implementation of VMT reduction strategies, this impact would be ***significant and unavoidable***.

Impact 3.14-3: Implementation of the Housing Element Programs would not substantially increase hazards due to a geometric design feature or incompatible use.

While the designs of individual residential development projects covered by the Sausalito Housing Element programs are not known at this time, vehicular access is anticipated to generally take place via existing streets. Where new roads or access points are required,

specific access schemes would be determined during project design, and would undergo review for compliance with safety and design standards by the City of Sausalito as required. During such reviews, routine assessments include consideration of the potential need for traffic control or turn lane improvements to maintain safety, the potential for queueing conditions that could lead to safety concerns, and safety related to site accessibility for non-auto modes. Any new transportation facilities would be designed and constructed to local, regional, and federal standards, and as such, would not be expected to introduce any hazardous design features.

The memorandum *Traffic Safety Bulletin 20-02-R1: Interim Local Development Intergovernmental Review Safety Review Practitioner's Guidance*, California Department of Transportation (Caltrans), 2020, provides guidance on how jurisdictions and practitioners may assess transportation safety topics associated with local development projects. The memorandum notes that, "This interim guidance is intended to apply to proposed land use projects and plans affecting the State Highway System (SHS). Specific effects may include but are not limited to adding new automobile, bicycle, or pedestrian trips to state roadways; modifying access to state roadways; or affecting the safety of connections to or travel on state roadways." The memorandum further explains that the guidance "does not establish thresholds of significance for determining safety impacts," and reiterates that "Automobile congestion or delay itself does not constitute a significant environmental impact (Public Resources Code, §21099(b)(2)), and traffic safety should not be used as a proxy for road capacity." As previously noted, development proposals would be reviewed by the City of Sausalito, who, as part of standard procedures, may also refer larger projects located near US 101 to Caltrans for review. Site-specific safety assessments and required improvement measures would be established during such reviews, ensuring that project design features do not create safety hazards.

In summary, development of sites identified in Housing Element programs would be reviewed during standard entitlement processes for conformance with applicable design standards and regulations, ensuring that developments will not substantially increase transportation hazards. Impacts would be considered ***less than significant***.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Impact 3.14-4: Implementation of Housing Element Programs would not result in inadequate emergency access

The proposed project is programmatic in nature and does not directly assess or analyze the emergency access needs of individual development sites, though the city has existing policies

and practices in place that require emergency access to be analyzed during development project entitlement reviews. Because Sausalito is predominantly built out, emergency access to potential housing sites would generally occur via existing roadways. Housing Element programs do not identify any new major roadways or other physical features that would result in inadequate emergency access.

The Sausalito General Plan includes several policies and programs addressing emergency access. Policy HS-2.4 requires the city to "provide and maintain adequate access for emergency vehicles and equipment, particularly firefighting equipment," and Program HS-2.4.2 requires private development to construct street frontage improvements to preserve safety where neighborhood compatibility concerns can be addressed. Program CP-2.5.1 calls for the city to develop goals for residential street parking including addressing circulation safety. With respect to construction activity, HS-2.4.1 calls for the city to maintain an encroachment permit process regulating construction vehicles and equipment that occupy the public right-of-way.

The City of Sausalito and responsible emergency service agencies including Southern Marin Fire Protection District will review individual development projects to confirm that they conform to applicable regulations as governed by State laws, including the 2019 California Building Code, as well as the Southern Marin Fire Protection District Wildland Interface (WUI) ordinance (ratified by the City of Sausalito in March 2019), which outlines specific emergency access requirements for development in these areas. During such development reviews, responsible agencies will confirm that emergency vehicle access is adequate, including access from public streets to sites, internal circulation, and maneuverability at intersections. Proposed development projects that do not meet required standards and codes would not be permitted.

The added vehicular traffic associated with development of potential housing sites could affect emergency response vehicles during peak commute hours; however, responders are trained to manage congested conditions by employing tactics such as using sirens, making use of turn lanes and shoulders to bypass stopped traffic, and utilizing alternate routes to bypass congestion and minimize response times. California law also requires drivers to yield the right-of-way to emergency vehicles and remain stopped until emergency vehicles pass. With respect to conditions that may occur during emergency evacuations, please see section 3.8, Hazards and Hazardous Materials.

Considering that individual development projects proposed on potential sites identified in the Housing Element will be subject to established procedures for reviewing project-level emergency access needs and compliance with State and local law as part of the entitlement process, the project's impacts to emergency access would be considered ***less than significant***.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures

None Required

Impact 3.14-5 Implementation of the Housing Element Programs, in conjunction with cumulative development, would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (a).

Cumulative development in the Bay Area was evaluated in Plan Bay Area 2050. The Plan Bay Area 2050 EIR notes that although VMT is expected to decline in the by Bay Area by 2050, there remains a gap between SB 375 targets and the targets needed to meet State GHG reduction goals linked to transportation. The ability to reduce regional VMT is tied to local jurisdictions and their ability to meet VMT targets in compliance with thresholds they set to meet CEQA Guidelines Section 15064(3)(b). Because regional entities, such as MTC and ABAG, cannot require local jurisdictions to reduce their local VMT, the cumulative impact of regional growth on VMT would be potentially significant.

With respect to significant VMT impacts, significance is established by comparing Existing plus Project conditions to VMT thresholds based on VMT per capita and VMT per employee performance metrics, as summarized above. As the OPR Technical Advisory states, "A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact." While not used in this analysis for the purposes of establishing impact significance, the cumulative 2040 plus Project VMT per capita and VMT per employee associated with the proposed Housing Element Programs were projected using the TAMDM model. As shown in Table 3.14-2, the results indicate that the 2040 plus Project residential VMT per capita would be 16.5 miles, which continues to be above the significance threshold of 12.6 miles. For the sites containing added nonresidential uses, the cumulative VMT per employee of 23.5 is also projected to remain above the significance threshold of 15.4 VMT per employee. As a result, it can be concluded that the project's contribution to VMT impacts would be cumulative considerable, and the cumulative impact would be potentially significant.

Level of Significance before Mitigation

Potentially Significant

Mitigation Measures

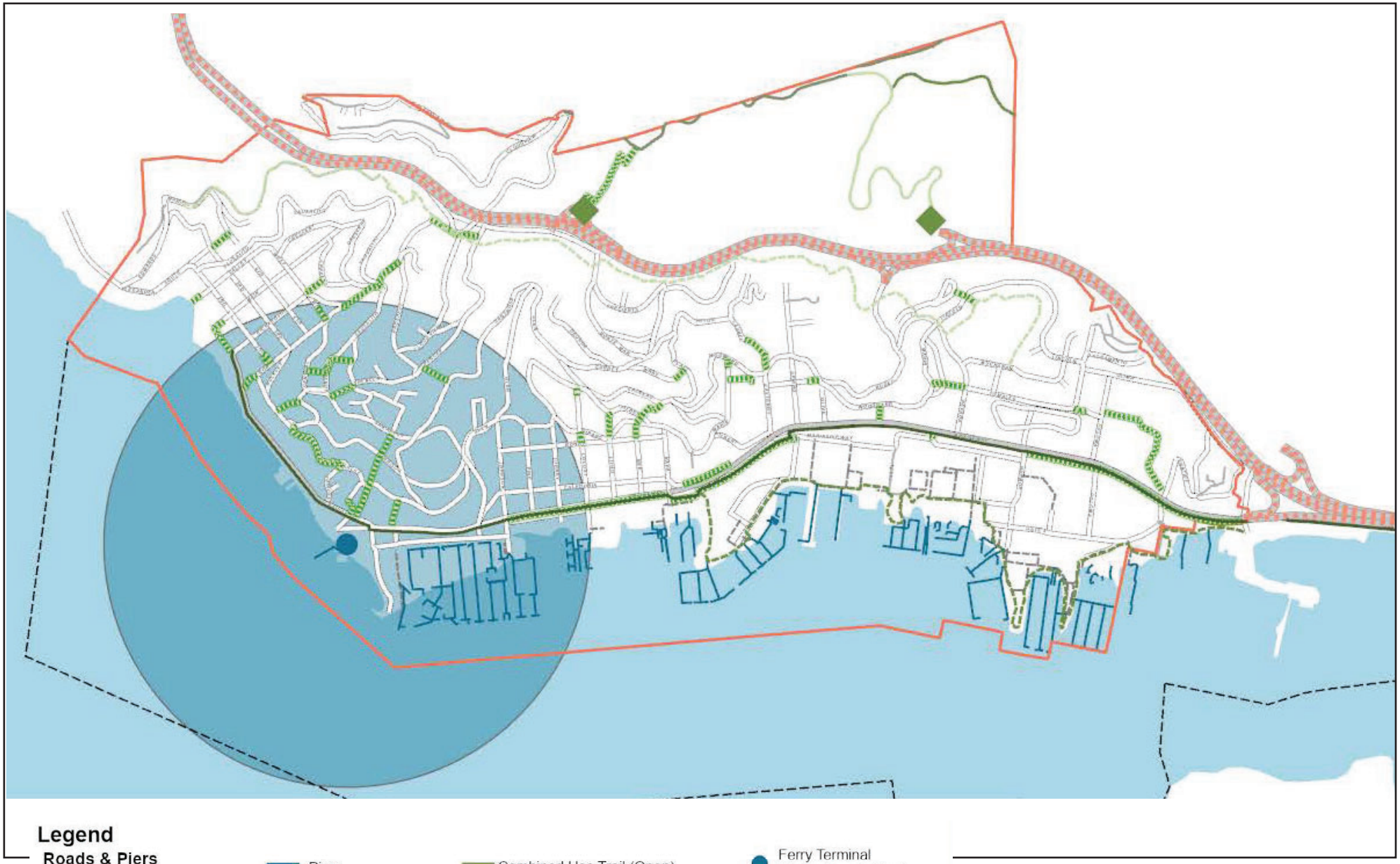
MM 3.14-5 Implement Mitigation Measure 3.14-2.

Level of Significance after Mitigation

Significant and Unavoidable

Implementation of this mitigation measure would reduce the VMT impacts associated with future development projects. Due to the uncertainty about the ability for development projects on all opportunity sites to achieve the required VMT reductions—particularly those

projects on sites where it is infeasible to provide new or more frequent transit service and few alternative VMT reduction strategies are viable, this impact would be ***significant and unavoidable***.



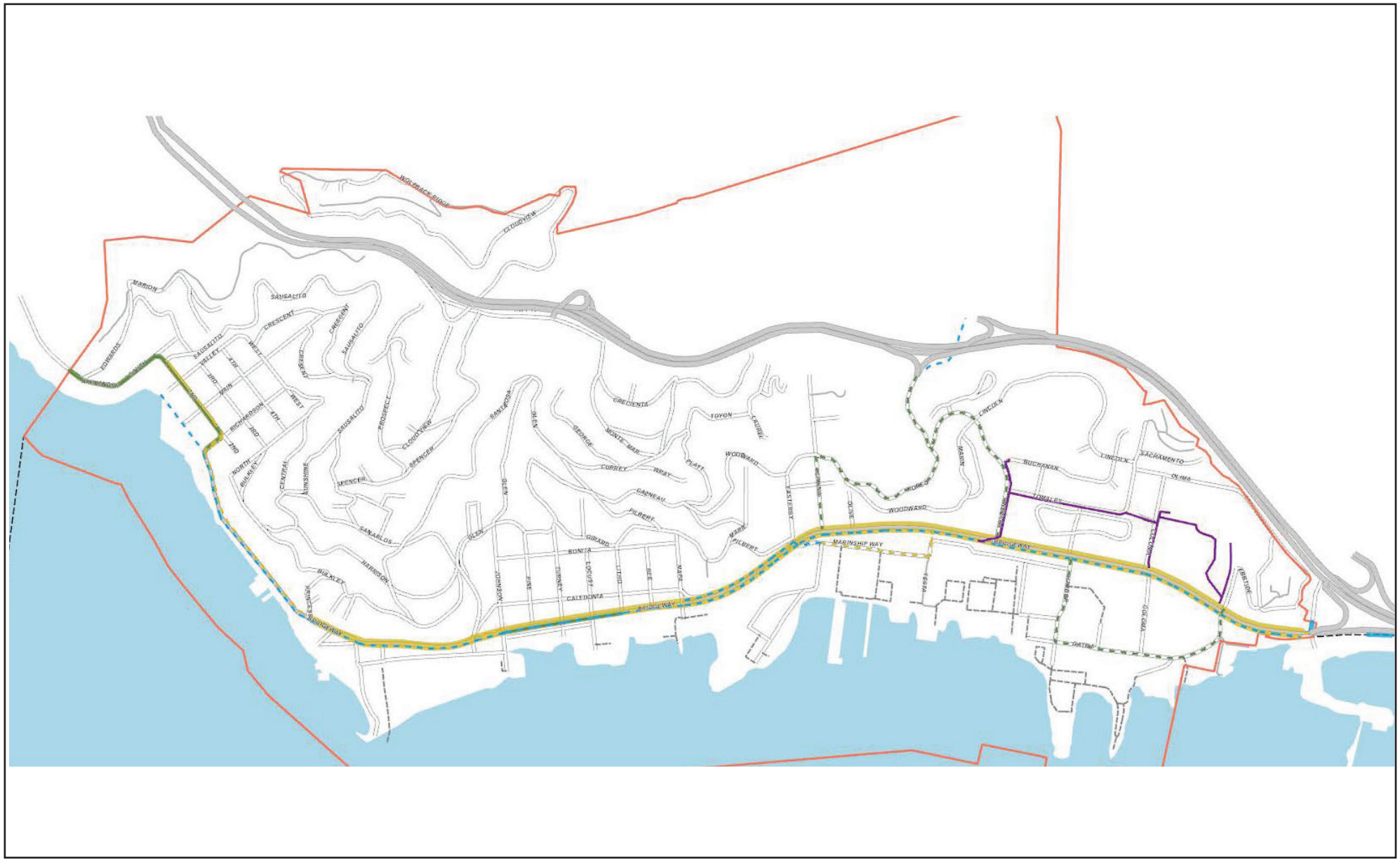
City of Sausalito General Plan, City of Sausalito, 2021, excerpt from Figure 5-2: Circulation

CITY OF SAUSALITO AMENDED HOUSING ELEMENT EIR

Figure 3.14-1. General Plan Circulation Diagram

W-Trans

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm



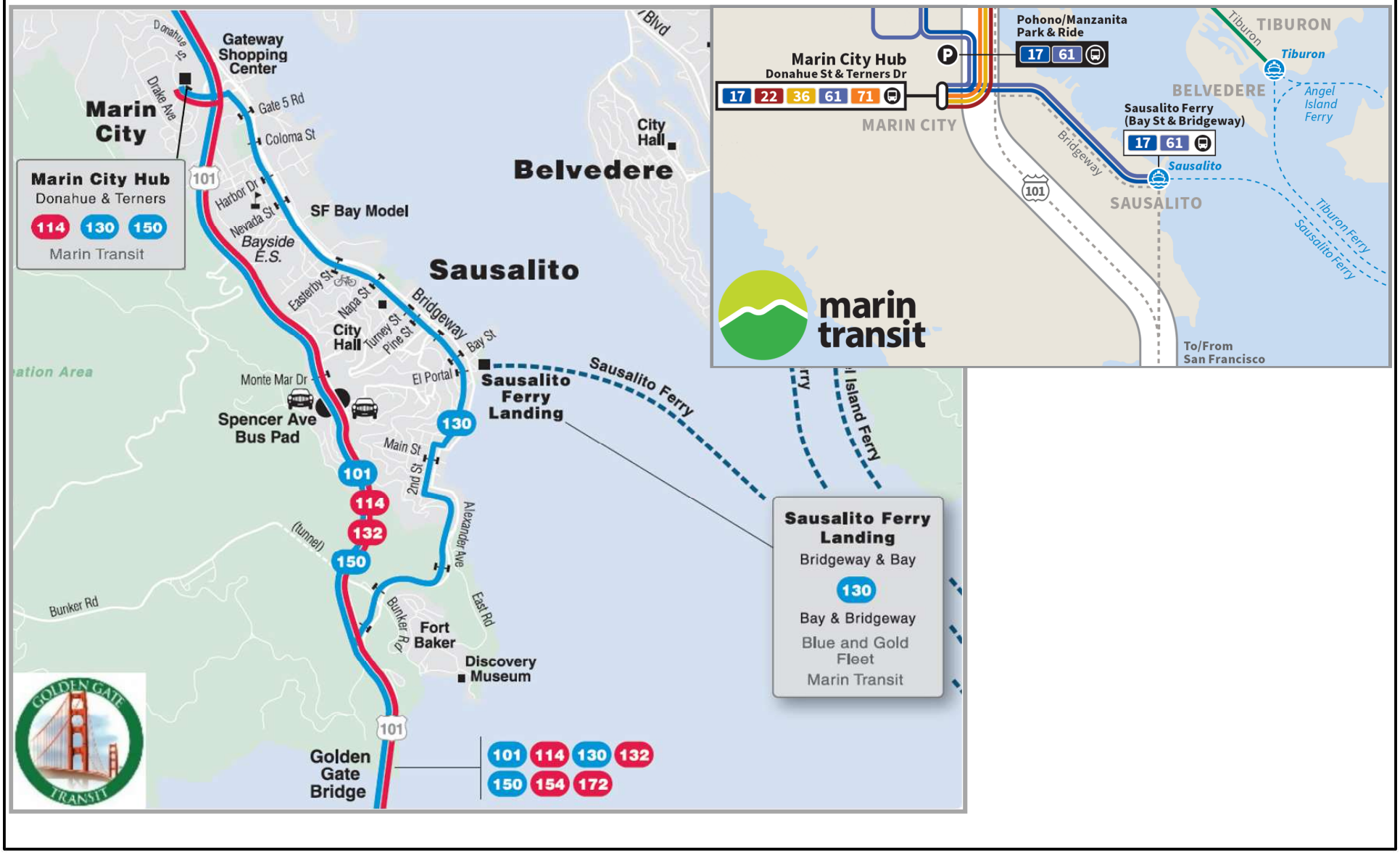
City of Sausalito General Plan, City of Sausalito, 2021, excerpt from Figure 5-3: Bicycle Paths

CITY OF SAUSALITO AMENDED HOUSING ELEMENT EIR

Figure 3.14-2. Bicycle Facilities

W-Trans

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm



CITY OF SAUSALITO AMENDED HOUSING ELEMENT EIR

Figure 3.14-3. Sausalito Transit Routes

Golden Gate Transit, May 2024; Marin Transit, May 2024

4.0 ALTERNATIVES TO THE AMENDED HOUSING ELEMENT

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this environmental impact report (EIR) must describe a range of reasonable alternatives to the proposed Project that might feasibly accomplish most of the basic objectives of the proposed Project and avoid or substantially lessen one or more of the significant effects of the project. The feasibility of an alternative is determined by the lead agency based on a variety of factors including but not limited to site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (CEQA Guidelines Section 15126.6(f)(1)).

The chapter discloses the comparative effects of each of the alternatives relative to the Amended Housing Element project, and evaluates the relationship of the alternatives to the objectives of the proposed Project. As required under Section 15126.6(e) of the CEQA Guidelines, an environmentally superior alternative for the proposed Amended Housing Element project is identified at the end of this chapter.

4.1 FACTORS IN THE SELECTION OF ALTERNATIVES

4.1.1 PROJECT OBJECTIVES

CEQA Guidelines Section 15124(b) requires a statement of objectives sought by a proposed project, including the underlying purpose of the project. The Amended Housing Element project is intended to guide housing development in order for the City to meet its RHNA requirement. For the purpose of this EIR analysis, the following objectives have been identified for the Amended Housing Element:

1. Update the General Plan's Housing Element to comply with State-mandated housing requirements and to address the maintenance, preservation, improvement, and development of housing in the City through 2031.
2. Establish an inventory of housing sites and rezone the sites as necessary to meet the required Regional Housing Needs Allocation and to provide an appropriate buffer to assist in providing sites in accordance with No Net Loss requirements under Government Code Section 65863.
3. Amend the General Plan, including the Land Use Element; Community Design, Historic, and Cultural Preservation Element; and Circulation and Parking Element as needed to maintain internal consistency.
4. Accommodate the City's housing needs in a manner that affirmatively furthers fair housing while preserving the character of the City, including its aesthetic and historic resources, and promoting the safety and welfare of both existing and future residents, and maintaining opportunities for economic development.

4.2 SIGNIFICANT EFFECTS OF THE PROPOSED PROJECT

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental effects of the proposed Amened Housing Element project on various aspects of the environment are discussed in detail in Chapter 3, Environmental Impacts, Setting, and Mitigation Measures. The project-specific and cumulative impacts that cannot be avoided if the proposed Amended Housing Element project is approved as proposed are listed below.

4.2.1 PROJECT-SPECIFIC SIGNIFICANT AND UNAVOIDABLE EFFECTS

Impact 3.1-1: Development facilitated by the Amended Housing Element would have a substantial adverse effect on a scenic vista.

Impact 3.1-2: Implementation of the Amended Housing Element would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a State scenic highway.

Impact 3.1-3: Development facilitated by the Amended Housing Element would substantially degrade the existing visual character or quality of public views in non-urbanized areas. (Public views are those that are experienced from publicly accessible vantage points).

Impact 3.1-4: Implementation of the Amended Housing Element would substantially conflict with applicable zoning and other regulations governing scenic quality in urbanized areas.

Impact 3.1-5: Development facilitated by the Amended Housing Element would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact 3.4-2: Development facilitated by the Amended Housing Element could result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Impact 3.4-3: Implementation of the Amended Housing Element could result in disturbance of human remains, including those interred outside of formal cemeteries.

Impact 3.4-4: Implementation of the Amended Housing Element could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k).

Impact 3.4-5: Implementation of Amended Housing Element could cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Impact 3.14-2: Implementation of the Amended Housing Element would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (a).

Impact 3.15-1: Implementation of the Amended Housing Element could require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects (water supply).

~~**Impact 3.15-2:** Sufficient water supplies may not be available to serve development facilitated by the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.~~

Impact 3.16-1: Implementation of the Project could result in the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Impact 3.16-2: Development facilitated by the Project in or near State responsibility areas or lands classified as very high fire hazard severity zones would substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact 3.16-3: Development facilitated by the Project to implement the Housing Element in areas located in or near State responsibility areas or lands classified as very high fire hazard severity zones would, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, due to slope, prevailing winds, and other factors.

Impact 3.16-5: Development facilitated by the implementation of the Project in areas located in or near State responsibility areas or lands classified as very high fire hazard severity zones could substantially expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

4.2.2 CUMULATIVE SIGNIFICANT AND UNAVOIDABLE EFFECTS

Impact 3.4-6: Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impacts with respect to historic, cultural, or tribal cultural resources.

Impact 3.14-5: Implementation of the Housing Element Programs, in conjunction with cumulative development, would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (a).

Impact 3.15-6: Development facilitated by the Project, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to water supply, wastewater, solid waste, and storm drain facilities (water supply).

Impact 3.16-6: Development facilitated by the Project to implement the Housing Element Programs, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to wildfire.

4.3 ALTERNATIVES CONSIDERED BUT DISMISSED FROM FURTHER CONSIDERATION

In identifying alternatives to implement the proposed Amended Housing Element project, primary consideration was given to alternatives that could reduce significant unavoidable impacts resulting from development that would be allowed under the proposed Amended Housing Element while still achieving the basic objectives of the proposed Project. Certain impacts that are identified as being significant and unavoidable under the proposed Project would be due primarily to redeveloping underdeveloped or vacant sites. These impacts would not be eliminated, but could be reduced, for example, by limiting the scale of development allowed under the proposed Amended Housing Element project, or implementing specific measures. Alternatives that would reduce the intensity of development allowed under the proposed Project are addressed later in this chapter. Section 15126.6(c) of the CEQA Guidelines requires the City to disclose alternatives that were considered but rejected from further analysis in this Draft EIR and provide the rationale for dismissal of those alternatives.

4.3.1 EXPANDED OPPORTUNITY SITE 84

The Martin Luther King, Jr. Park is approximately 17 acres and is located in an area close to community services which could serve new housing (see **Figure 4-1**). One alternative considered but dismissed would develop all of Martin Luther King, Jr. Park, including Buildings 1-7 which house a variety of community resources such as preschools, recreational programming, art classes, community centers, school camps, a French immersion school – Lycée Français de San Francisco, The New Village School which serves preschool through 8th grade students, the MLK Gym which includes the Playland Indoor Bounce House Playground, an outdoor playground, and basketball courts.

Another similar alternative could retain the existing buildings onsite and develop the portions of the site that do not currently have structures, including the existing parking lots, grassy areas, and Remington Dog Park.

Either of these development scenarios could allow for significant residential development due to the sheer size of the parcel. However, both of these alternatives would remove or significantly reduce the Martin Luther King, Jr. Park and remove recreational and educational resources from the community. Particularly, removal of the buildings onsite would eliminate schools and recreational programing spaces that the entire community enjoys. Under both alternatives, significant outdoor recreational space would be eliminated. Removal of Martin Luther King, Jr. Park would have a significant adverse social impact on the residents of

Sausalito. There is not another location within the city to which these resources could be relocated. Outright elimination of these recreational facilities would adversely affect the social balance of the city, remove recreational opportunities, and decrease the quality of life Sausalito residents enjoy. Therefore, this alternative was rejected and was not analyzed further.

4.4 ALTERNATIVES SELECTED FOR FURTHER CONSIDERATION

This section describes the range of alternatives to the proposed Project that are analyzed in this Draft EIR and examines how specific environmental impacts would differ in severity compared to those associated with the proposed Project. For the most part, significant impacts of the alternatives can be mitigated to less-than-significant levels through adoption of the mitigation measures identified in Chapter 3, which contains the environmental analysis of the proposed Project. To varying degrees, the following alternatives would also avoid and/or lessen impacts, including some or all of the significant and unavoidable impacts, of the proposed Project. The following alternatives are considered in this section:

- Alternative 1a – No Project/No Rezoning
- Alternative 1b – No Project, Adopted Housing Element
- Alternative 2 – Reduced Sites
- Alternative 3 – Modified Sites
- Alternative 4 – Historic Preservation
- Alternative 5 – Modified Project

CEQA requires consideration of the No Project Alternative, which addresses the impacts of not moving forward with the proposed Project. The No Project Alternative can take many forms, including doing nothing, depending on what may likely occur if a project is not developed. In the case of the proposed Project, the "No Project/No Rezoning" alternative consists of developing Inventory Sites and Opportunity Sites under the City of Sausalito's existing Zoning Map designations. The "No Project/Adopted Housing Element" alternative consists of implementation of the adopted 6th Cycle Housing Element, including the rezoning of Opportunity Sites.

The four alternatives further analyzed in this EIR identify ways to reduce environmental impacts from the proposed Amended Housing Element project. All three alternatives result in a different number of housing units to be constructed to meet the City's RHNA minimum requirement of 724 units. **Table 4-1** compares the alternatives' unit counts to the proposed Project's unit count.

TABLE 4-1: COMPARISON OF HOUSING UNITS

	TOTAL NUMBER OF NEW HOUSING UNITS	UNIT DIFFERENCE FROM PROPOSED PROJECT
Amended Housing Element (Proposed Project)	1,147	---
Alternative 1a – No Project/No Rezoning	378	-769
Alternative 1b – No Project/Adopted Housing Element	1,147	-
Alternative 2 – Reduced Sites	1,074	-73
Alternative 3 – Modified Sites	1,147	0
Alternative 4 – Historic Preservation	1,044	-103
Alternative 5 – Modified Project	1,093-1,133	-14 to -54
SOURCE: De Novo Planning Group, 2024.		

4.4.1 ALTERNATIVE 1A — NO PROJECT/NO REZONING

CEQA Guidelines Section 15126.6(e) requires an EIR to evaluate a 'No Project Alternative,' which is defined as what would be reasonably expected to occur in the foreseeable future if the project were not approved. The No Project Alternative would allow the 6th Cycle Housing Element to remain in place and would not include the rezoning and Objective Design and Development Standards (ODDS) efforts, including the implementation of Programs 4, 8, and 19, that are being implemented in conjunction with the Amended Housing Element project. Development accommodated under Alternative 1a would be approximately 191 dwelling units on Housing Element sites with existing General Plan land use designations and zoning to accommodate residential development and approximately 187 accessory dwelling units and SB 9 units, resulting in limited progress toward implementing the City's Housing Element.

Alternative 1a would not rezone any parcels within the city to accommodate very low, low, moderate, or above moderate-income housing, as the rezoning would occur as a separate future action under the adopted 6th Cycle Housing Element. Zoning overlays would not be developed or implemented on parcels throughout the city to identify minimum residential and mixed-use densities (see **Figure 4-2**). The City would not make publicly-owned sites available for development during the 2023-2031 Housing Element planning period, as described in Housing Element Policy 8. Further, Alternative 1a would not develop design standards, height limits, streamlined ministerial review, historic preservation, and historic design guidelines to support removing governmental constraints and making the sites identified by Program 4 available for development as envisioned by the Amended Housing Element.

Under Alternative 1a, sites anticipated for rezoning under the proposed Project would not be rezoned, including those sites subject to a vote of the electorate as set forth in Ordinance

1022 and Ordinance 1128. The City would not initiate or conduct an election to rezone specific sites identified as initiative-restricted, specifically Sites 39, 44, 47, 72, 79, 81, 84, 201, 211, 212, 301, 303, 306, 401, and 402, as identified in Appendix D1 of the Amended Housing Element.

This alternative would not result in the establishment of new zoning overlay designations, would not change the City's Zoning Code, and would not change the existing Zoning Map. Further, preparation of ODDS would not occur, and the City would continue to use the General Plan policies and Zoning Code standards to direct and inform growth in the city. All sites identified as Opportunity Sites in this EIR would retain their existing zoning designations and would be anticipated to build out using the same zoning designations as currently exist, and at the maximum densities allowable, consistent with the General Plan.

All sites identified as Inventory Sites, Opportunity Sites, and sites that have approved but not yet constructed units would be developed according to their existing zoning or approved plans, respectively. As a result, approximately 378 units would be constructed, which would be 769 units less than those proposed under the Amended Housing Element project.

However, if the City does not complete rezoning to comply with Housing Element Program 4 and Government Code Section 65583(c)(1)(A) by Jan. 1, 2026 the City will be out of compliance with state housing element law, and the "Builder's Remedy" under Government Code Section 65589.5 et seq., as amended by AB 1893 will apply to the City, potentially allowing greater development than is presently allowed or that is contemplated by the Project or Alternative 1a.

Comparative Analysis of Environmental Effects

In general, the effects of the No Project Alternative would be a continuation of the existing zoning designations, with Opportunity Sites developing according to the Zoning Map currently in place.

Impacts Identified as Being the Same as or Similar to Those of the Proposed Project

Similar to the proposed Project, Alternative 1a would not result in unplanned population growth nor displace a substantial number of people such that the provision of new housing would be required. Population growth in the city would be in line with the adopted General Plan, including land use designations ~~The alternative would plan for population growth in the city~~ consistent with the adopted General Plan. Therefore, ~~and~~ there would be no impact (Impacts 3.12-1 and 3.12-2).

Impacts Identified as Being Less Severe than Those of the Proposed Project

While ~~the No Project~~ Alternative 1a would accommodate development on sites identified in the ~~Alternative 1~~ Housing Element, development would only occur on sites designated by the General Plan and the Zoning Ordinance to allow residential uses. Development under ~~the No Project~~ Alternative 1a would occur at existing densities allowed under the existing

General Plan and Zoning Ordinance. This would have the effect of reducing the overall size of potential development on many of the sites, particularly those identified to have increased densities through the application of overlay zoning as envisioned by Program 4. Impacts determined by the development footprint of future projects would be reduced ~~to~~ as compared to the proposed Project. There would be no disturbance associated with ~~the~~ Alternative 1a on sites that were not anticipated to accommodate residential uses without a rezone, including sites designated Industrial, Commercial Waterfront, Waterfront, and Public Institutional by the General Plan. These reduced impacts would include disturbance to special-status species, riparian habitats (Impact 3.3-1); sensitive natural communities, wetlands, waters of the United States (Impact 3.3-2); migratory fish or wildlife species (Impact 3.3-3); damage to historic, archaeological, paleontological, and tribal cultural resources (Impacts 3.4-2, 3.4-3, 3.4-5, 3.4-6, 3.6-6, and 3.6-7); or substantial alteration of drainage patterns resulting in erosion or siltation (Impact 3.9-3).

The reduced density under Alternative 1a would accommodate greater setbacks from existing buildings, including historic structures, than the proposed Project, and construction-related vibration impacts would be less (Impact 3.11-2). Similarly, light and glare impacts would be reduced as less development is likely to occur (Impacts 3.1-5 and 3.1-6) under Alternative 1a as compared to the proposed Project.

Growth projections would be lower under Alternative 1a compared to the proposed Project, as fewer residential units could be accommodated. Therefore, population demand-related impacts would be less under Alternative 1a, including for public infrastructure and utility systems, including water supply systems (Impacts 3.15-1 through 3.15-6); public services and recreation (Impacts 3.13-1 through 3.13-4); and energy (Impacts 3.5-1 through 3.5-3). Exposure of residents to potential hazards would also be slightly less under Alternative 1a because there would be fewer residents compared to the proposed Project. Impacts would be less related to geology and seismicity (Impacts 3.6-1 through 3.6-7), hazards and hazardous materials (Impacts 3.8-1 through 3.8-6), hydrology and water quality (Impacts 3.9-1 through 3.9-9), and wildfire (Impacts 3.16-1 through 3.16-6) as fewer residents would be exposed to potential hazards.

Alternative 1a would leave existing zoning and housing programs unchanged and would be expected to result in 148 additional residential units in Sausalito. Many of these would consist of single or several homes on currently-vacant or underutilized lots (as identified through the Housing Element process), accessory dwelling units, or SB 9 lot splits containing up to two single-family homes with two ADUs. Such projects are generally exempt from CEQA and would not be subject to a VMT analysis. Based on the maximum permitted densities, only three of the sites included in Alternative 1a, including the currently-proposed 19-unit project at 1757 Bridgeway, are anticipated to potentially be subject to a VMT analysis, since it would likely generate just over 110 daily vehicle trips. Projects generating fewer than 110 daily trips qualify for the "small project" screening provision and may be considered to have a less-than-significant VMT impact. Adjustments to the model's base VMT projections would

be warranted due to these sites having densities that accommodate high density residential and/or mixed uses at up to 29 units per acre and the inclusion of moderate income units on the 1757 Bridgeway and 2829 Bridgeway sites and lower and moderate income units at the 330 Ebbtide site. Increases to residential density and provision of affordable housing have both been found to reduce VMT, as discussed and quantified in the *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, California Air Pollution Control Officers Association (CAPCOA), 2021.

With respect to total home-based VMT, Alternative 1a is estimated to generate approximately 17,000 to 23,000 fewer miles traveled than the proposed Project. This is primarily because Alternative 1a would result 769 fewer residential units than the proposed Project, though the unit locations also play a modest role.

Because the majority of potential housing units included in Alternative 1a would either be screened from CEQA-based VMT analysis or be expected to result in a less-than-significant VMT impact, implementation of Alternative 1a would also be considered to a reduced impact in comparison to the proposed Project.

As VMT levels would decrease, so would the emissions associated with vehicle travel. Therefore, air quality impacts (Impacts 3.2-1 through 3.2-5) and greenhouse gas emissions (Impacts 3.7-1 through 3.7-3) under Alternative 1a would also be slightly less than the proposed Project.

Impacts Identified as Being More Severe than Those of the Proposed Project

There are no impacts from the implementation of Alternative 1a that would be greater than the proposed Project.

Relationship to Significant and Unavoidable Impacts

Implementation of Alternative 1a would reduce the significant and unavoidable aesthetics impacts (Impact3.1-1 through 3.1-5) because development in scenic vistas would be less than under the proposed Project. Building heights would not be potentially increased, and building densities would not significantly increase, thereby not blocking views as much as under the proposed Project.

Implementation of Alternative 1a would reduce the significant and unavoidable VMT impacts (Impact 3.14-2 and Impact 3.14-5) associated with the proposed Project.

Alternative 1a would also reduce the demand for public utilities including water supplies (Impact 3.15-2 and Impact 3.15-6). Further, the reduction in development would reduce the demand for public utilities and associated impacts associated with the relocation or construction of new or expanded water facilities (Impact 3.15-1).

Alternative 1a would not eliminate any of the Cultural and Tribal Cultural significant and unavoidable impacts (Impacts 3.4-1 through 3.4-6) as previously unidentified resources could still be encountered during construction activities.

Relationship to Project Objectives

Development under ~~the No Project Alternative~~Alternative 1a would not achieve any of the project objectives. Development under the existing General Plan, including the 6th Cycle Housing Element, and existing Zoning Code would not develop enough housing units to accommodate the RHNA-required minimum of 724 units at the income units mandated by State law. Not only would ~~the No Project Alternative~~Alternative 1a fail to accommodate the minimum number of housing units, it would fail to establish an inventory of future housing sites. Alternative 1a would not amend the General Plan to create consistency across the General Plan elements because the Housing Element would not be updated. This alternative would not affirmatively further fair housing because no additional sites would be made available to increase density. However, existing General Plan policies that address the City's character, views, historic resources, and safety would remain in place.

4.4.2 ALTERNATIVE 1B — NO PROJECT/ADOPTED HOUSING ELEMENT IMPLEMENTATION

CEQA Guidelines Section 15126.6(e) requires an EIR to evaluate a 'No Project Alternative,' which is defined as what would be reasonably expected to occur in the foreseeable future if the project were not approved. Alternative 1b would allow the adopted 6th Cycle Housing Element to remain in place, and would include implementation of the adopted 6th Cycle Housing Element, including the rezoning of sites and adoption of Objective Design and Development Standards (ODDS) efforts, including the implementation of Programs 4, 8, 16, and 19.

Program 4 provides for the rezoning of Opportunity Sites to accommodate the RHNA, with a modest buffer. Development accommodated under Alternative 1b would be up to approximately 1,147 dwelling units on Housing Element sites with existing General Plan land use designations and zoning to accommodate residential development and Opportunity Sites to be rezoned under Program 4, including 811 units on Opportunity Sites and approximately 187 accessory dwelling units and SB 9 units, as shown in **Table 4-2**. **Figure 4-3** identifies the Inventory Sites and Opportunity Sites associated with Alternative 1b.

Under Alternative 1b, Opportunity Sites 401 and 402 would not be included in the adopted Housing Element and there would be no increase in development potential on Opportunity Site 303 (which decreases from 129 units of realistic capacity designated under the Project to 90 units under Alternative 1b) or Opportunity Site 84 (which decreases from 94 units under the Project to 80 units under Alternative 1b). Under Alternative 1b, there would an increase in the development potential of Opportunity Sites 23, 24, 39, 44, 47, 201, 207, and 301, which

are modified to have overlays that allow up to 29 units per acre under the Project, rather than overlays that accommodate 43-49 units per acre under Alternative 1b. Under the Project, Sites 85 and 209 along with two parcels of Site 44 and one parcel of Site 207 would be removed – these sites would continue to be developed under Alternative 1b.

TABLE 4-2: DEVELOPMENT CAPACITY FOR ALTERNATIVE 1B

	CAPACITY (HOUSING ELEMENT REALISTIC CAPACITY)					MAXIMUM CAPACITY	
	EXTREME-LY/ VERY LOW	LOW	MODER-ATE	ABOVE MODERATE	TOTAL	UNITS	NON-RESIDENTIAL SQUARE FEET
RHNA	**200**	**115**	**114**	**295**	**724**		
Approved/Entitled Projects	**3**	7	6	7	23	23	-
Inventory of Existing Residential Sites, including Pending Projects	1	1	47	73	122	126	-1,584
ADU & SB 9 Projected Units	12	27	30	47	116	187	-
Opportunity Sites							
Housing – 43-49 du/ac	30	16	40	47	133	164	-
Housing – 50-70 du/ac	69	34	13	18	134	159	-3,310
Mixed Use 49/85%	122	69	47	120	358	465	25,856
Mixed Use 70/85%	0	0	11	11	22	23	-4,110
Total Capacity of Projects, Inventory of Existing Sites, and Opportunity Sites	**237**	**154**	**194**	**323**	**908**	**1,147**	**16,852**
Surplus[1]	37	39	80	28	184		

NOTE:

1. HCD recommends buffer in the housing element inventory of at least 15 to 30 percent capacity more than required, especially to accommodate the lower income RHNA. A modest surplus also allows various sites identified in the Housing Element to identify at different income levels than those anticipated, while still maintaining an adequate supply of available sites.

Alternative 1b would intensify the zoning of the Opportunity Sites to accommodate additional very low, low, moderate, or above moderate-income housing. Four zoning overlays would be implemented under Alternative 1b: Housing-49, MU-49/85%, Housing-70, and MU-70/85%. Two zoning overlays – Housing-29 and MU-29/85% – would not be developed or implemented under Alternative 1b.

The City would continue to make specific publicly-owned sites available for development during the 2023-2031 Housing Element planning period: Sites 75, 78, 84, and APN 065-062-19. These sites are planned to remain in City ownership and would be made available for development through long-term leases, as described in Program 8. This inventory would also include the Caltrans site (Site 85), which is proposed to be removed from the inventory under the Project.

Program 16 would amend the Zoning Ordinance to remove constraints to housing and accommodate a variety of housing types under Alternative 1b, similar to the Project as described in Chapter 2, Project Description.

The development and adoption of ODDS would still occur under Program 19, similar to the proposed Project.

Comparative Analysis of Environmental Effects

In general, the No Project Alternative would be a continuation of the existing, adopted Housing Element.

Impacts Identified as Being the Same as or Similar to Those of the Proposed Project
Overall, both scenarios have sites with similar land cover types and potential for special-status species and sensitive habitats as the sites modified by Alternative 1b are primarily located in developed areas. The exception to this is Site 85 which is added by Alternative 1b. Site 85 is undeveloped and designated as a mix of developed and non-native forest land cover (Figure 3.3-1). Due to the similar land cover types and condition of sites under Alternative 1b, similar impacts would include disturbance to special-status species, riparian habitats (Impact 3.3-1); sensitive natural communities, wetlands, waters of the United States (Impact 3.3-2); migratory fish or wildlife species (Impact 3.3-3).

It is anticipated that impacts determined by the overall development footprint of future projects would be similar under Alternative 1b as under the Project, as both scenarios would develop approximately 1,147 residential units. Under both scenarios, similar amounts of development and associated ground disturbance would occur. Impacts based on ground disturbance would generally be similar, including substantial alteration of drainage patterns resulting in erosion or siltation (Impact 3.9-3). Impacts to archaeological, paleontological, and tribal cultural resources (Impacts 3.4-3, 3.4-5, 3.4-6, 3.6-6, and 3.6-7), adverse effects associated with seismic events, expansive soils, and substantial soil erosion or loss of topsoil (Impacts 3.6-1, 3.6-3, 3.6-4, 3.6-5, and 3.6-6) would be comparable as a similar amount of ground would be disturbed under Alternative 1b compared to the Project.

Similar to the Project, Alternative 1b would not have the potential to divide an established community (Impact 3.10-1) as Alternative 1b does not include any features that would divide an existing community. Alternative 1b would have similar changes to the General Plan as described for the Project in Chapter 2, except that Alternative 1b would not include the Housing-29 and MU-29/85% overlay designations. Future development under Alternative 1b would be processed in the same manner as development under the Project and would thus be required to in a similar manner with adopted land use plans, policies, or regulations, resulting in similar impacts associated with conflicts with land use plans, policies, or regulations adopted to mitigate an environmental effect and cumulative impacts associated with land use planning (Impacts 3.10-2 and 3.10-3). Similar to the Project, Alternative 1b would accommodate planned regional population growth (both scenarios accommodating 1,147 units) and would not result in unplanned population growth nor displace a substantial number of people such that the provision of new housing would be required. Alternative 1b

would plan for population growth in the city consistent with the adopted Housing Element, and there would be no impact (Impacts 3.12-1 and 3.12-2).

While the sites and overlay densities are modified, Alternative 1b's growth projections would be comparable to the Project (both 1,147 units). Therefore, population demand-related impacts would be similar under Alternative 1b as compared to the Project, including for public infrastructure and utility systems, including water supply systems (Impacts 3.15-1 through 3.15-6); public services and recreation (Impacts 3.13-1 through 3.13-4); and energy (Impacts 3.5-1 through 3.5-3). Similarly, light and glare impacts would be similar due to the comparable overall levels of development (Impacts 3.1-5 and 3.1-6).

Neither the Project or Alternative 1b includes sites that are known to be affected by hazardous materials contamination and potential exposure of residents to potential hazards associated with hazardous materials would be similar under Alternative 1b (Impacts 3.8-1 through 3.8-6).

Due to the similar level of development under both Alternative 1b and the Project, impacts would be similar for Alternative 1b's potential to result in the wasteful, inefficient, or unnecessary consumption of energy, conflict with or obstruct a plan for renewable energy or energy efficiency and to result in cumulative impacts to energy resources (Impacts 3.5-1 through 3.5-3) and associated with operational noise (Impacts 3.11-1 and 3.11-3).

Due to similar overall levels of development, Alternative 1b would have comparable impacts associated with the potential to violate water quality standards or waste discharge requirements, degrade or decrease groundwater quality or recharge, alter existing drainage patterns, or create or contribute runoff (Impacts 3.9-1 through 3.9-5, 3.9-8 and 3.9-9). Both scenarios result in development within the 100- and 500-year flood zone and tsunami hazard zone, with Alternative 1b increasing development within the 500-year flood hazard zone associated with Sites 39, 44, 47, and 301, reducing development within the 100-year flood hazard zone for Site 402) and the 500-year flood hazard area for Site 303), increasing exposure to the tsunami hazard zone on Sites 39, 44, 201, and 301 and decreasing exposure on Sites 84, 303, and 402, resulting in similar overall impacts (Impact 3.9-7).

Impacts Identified as Being More Severe than Those of the Proposed Project

While both scenarios have similar levels of overall development, under Alternative 1b, there would be an increase in building heights and mass compared to the Project. The sites designated Housing-29 and MU-29/85% by the Project would be designated Housing-49 or MU-49/85% by Alternative 1b, which would allow an increase in building heights (four stories rather than 3 stories) and result in larger building masses to accommodate the increase in allowed densities. Both Alternative 1b and the Project would allow building heights up to 4 stories on Opportunity Sites, except the Project would decrease heights on Opportunity Sites that are designated for 29 units per acre to 3 stories. Alternative 1b would increase development on undeveloped sites (Site 85), while the Project would have more units on sites with existing development. Overall, Alternative 1b it would have a slightly higher

potential to impact scenic views, visual character, and view corridors (Impacts 3.1-1 through 3.1-4).

Alternative 1b and the Project would both result in development in areas with potentially unstable geologic areas, with Alternative 1b increasing development potential in very high liquefaction areas in some locations (Sites 39, 44, 301, 47, and 85) and reducing it in other locations (Sites 84, 303, 401, and 402) and Alternative 1b increases sites located in the highest landslide hazard designation (Site 85), resulting in a slight increase in hazards associated with unstable geologic units (Impact 3.6-2).

Impacts related to historic resources (Impacts 3.4-1 and 3.4-6) would be slightly more under Alternative 1b -because there would be greater potential to result in changes to designated historical resources that may alter a resource or its immediate surroundings in a manner that the significance of the resource would be materially impaired. Site 201 (APN 065-132-16) is located within the Sausalito Historic District and contains the Marin Fruit Co., a designated historic resource listed on the California Historic Preservation Office state registry and listed on the California State Parks Built Environment Resource Directory (BERD).[1] Sites 23 and 24 are located adjacent the Sausalito Historic District. Under Alternative 1b, Alternative 1b, Site 201 would have the MU-49/85% overlay designation and would allow up to four stories in height, rather than three stories under the MU-29/85% overlay designated by the Project. Similarly, Sites 23 and 24 adjacent the Downtown Historic District would be designated Housing-49 rather than Housing-29. The designations for Sites 23, 24, and 201 would accommodate higher densities and four-story buildings under Alternative 1b, compared to a three-story building height limit and lower densities (29 units/acre) under the Project. This increase in building heights and density would have a greater potential for development under Alternative 1b to conflict with the existing scale of historic buildings in the Sausalito Historic District, as the buildings in this area are limited to three stories in height. The increase in density would accommodate larger buildings and building footprints, potentially resulting in greater groundborne vibration impacts that could result in physical damage to a historical resource. The Project would reduce overall development as well as heights and densities in or adjacent to the Downtown Historic District, particularly on Sites 201, 23, and 24, although density on Site 202 would be the same between the Project and Alternative 1b. This reduction in densities in and adjacent to the Downtown Historic District would improve the potential for development under the Project to remain in scale with existing development in the District. Sites 44, 47, and 301 are near a potentially eligible historic resource near the intersection of Bridgeway and Locust. The higher densities and heights allowed on Sites 44, 47, and 301 under Alternative 1b could potentially result in impacts to the potential resource through the potential for damage associated with ground-borne vibration during construction activities.

[1] California State Parks, 2024. Built Environment Resource Directory (BERD). Resources by County: Marin County. Available: https://ohp.parks.ca.gov/?page_id=30338. Accessed: November 19, 2024.

Under Alternative 1b, residential VMT per capita would be 13.3 miles while non-residential VMT per employee would be 19.4 miles. The values would exceed the residential threshold of 12.6 VMT per capita and the nonresidential threshold of 15.4 VMT per employee, respectively. However, the Project would have residential VMT per capita of 13.2 miles, which is slightly less than under Alternative 1b. Non-residential VMT per employee would be 23.5 miles under the Project, which is significantly more as compared to Alternative 1b (Impact 3.14-2). Alternative 1b is projected to result in total VMT of 285,421 under Existing plus Project conditions and 333,016 under 2040 plus Project conditions, compared to Project VMT of 280,407 under Existing plus Project conditions and 325,020 under 2040 plus Project conditions.

As overall VMT levels would increase, so would ROG and NOx emissions associated with vehicle travel. Therefore, air quality impacts (Impacts 3.2-1 through 3.2-5) and greenhouse gas emissions (Impacts 3.7-1 through 3.7-3) under Alternative 1b would also be slightly worse than under the Project.

Under Alternative 1b, Sites 23, 24, and 207 would remain zoned as Housing-70, while Site 301 would remain zoned as MU-49/85%. Under the proposed Project, those four sites would be rezoned to Housing-29, a less intense use than either of the zones proposed under Alternative 1b. Under Alternative 1b, Sites 201, 39, 44, and 47 would remain zoned as MU-49/85%, a higher density than under the Project. Therefore, under Alternative 1b, it is possible there could be higher construction-related vibration impacts as compared to the Project due to the intensity of development anticipated on those sites (Impact 3.11-2).

Neither scenario has sites within a state-designated State Responsibility Area or Very High Fire Hazard Severity Zone. While the Project would increase units on Site 84 (locally designated very high and high fire hazard/wildland urban interface zones), Alternative 1b would increase units in the Downtown and along Bridgeway in the Downtown/Caledonia corridor vicinity, which are areas farther from the highway while the Project would improve proximity of units to evacuation routes (Bridgeway closer to Highway 101 interchange), and on steeply sloped sites (Site 85 and portions of Sites 207 and 209), slightly increasing hazards associated with wildfire and steep slopes. Overall, wildfire impacts would be similar under the Project and Alternative 1b (Impacts 3.16-1 through 3.16-6).

Relationship to Significant and Unavoidable Impacts

Implementation of Alternative 1b would slightly increase the significant and unavoidable aesthetics impacts (Impact3.1-1 through 3.1-5) because development affecting scenic vistas would be less than under the Project. Building heights and massing in the waterfront area and Downtown would be potentially increased under Alternative 1b, thereby potentially blocking views more than under the Project.

Implementation of Alternative 1b would slightly increase the significant and unavoidable VMT impacts (Impact 3.14-2 and Impact 3.14-5) as it would result in greater overall VMT as described above.

Similar to the Project, Alternative 1b would have comparable demand for public utilities including water supplies (Impact 3.15-2 and Impact 3.15-6) and impacts associated with the relocation or construction of new or expanded water facilities (Impact 3.15-1) as both scenarios would result in similar amounts of development (1,147 residential units).

Alternative 1b would not eliminate any of the Cultural and Tribal Cultural significant and unavoidable impacts (Impacts 3.4-1 through 3.4-6) as previously unidentified resources could still be encountered during construction activities and would have worse impacts associated with the Downtown Historic District and contributing resources.

Alternative 1b would have similar wildfire significant and unavoidable impacts (Impacts 3.16-1 through 3.16-5) as neither scenario has sites within a state-designated State Responsibility Area or Very High Fire Hazard Severity Zone and both scenarios result in impacts associated with very high and high fire hazard/wildland urban interface zones as described previously.

Relationship to Project Objectives

Development under Alternative 1b would develop enough housing units to accommodate the RHNA-required minimum of 724 units at the income units mandated by State law. However, Site 85 is unlikely to develop during the 6th Cycle (2023-2031). While Alternative 1b would create the potential for Site 85 to develop long-term, it is not expected to meet the 6th Cycle RHNA. Therefore, Alternative 1b would reduce the City's capacity to accommodate the RHNA for the 6th Cycle. Alternative 1b would amend the General Plan to create consistency across the General Plan elements, but would reflect the adopted Housing Element. While this alternative would affirmatively further fair housing in a manner similar to the Project, it would have a worse impact related to aesthetic and historic resources and would not achieve the objective of preserving the character of the City, including its aesthetic and historic resources, as well as the Project.

~~4.4.2~~4.4.3 ALTERNATIVE 2 — REDUCED SITES

Alternative 2 focuses on removing sites from the Amended Housing Element that have challenging geographic locations. Specifically, Opportunity Sites that are located in micro-analysis zones (MAZs) that have high residential VMT levels (>18.0 per capita) in the Cumulative + Project scenario were removed. Removal of these sites reduces the number of housing units far from employment and services hubs, and concentrates new housing more proximate to those uses. Due to the lack of direct routes through the city to identified evacuation routes, sites that have high VMT levels would also have longer travel distances and times to those routes in an emergency. Additionally, Opportunity Sites located in high-

risk landslide hazard areas (rated as 8 or above) were also removed from the list of potential sites to be implemented by the Amended Housing Element. This alternative reduces the risk of natural disasters adversely affecting a significant number of housing units. Steep slopes increase the risk of landslides, liquefaction, or slope instability. Sites that have been removed from the Opportunity Sites list would continue to accommodate development as allowed by the adopted General Plan; however, this alternative would limit future development of the affected Opportunity Sites as shown in **Table 4-32**.All other Opportunity Sites identified in the Amended Housing Element and proposed to be implemented under the Amended Housing Element project would be rezoned as anticipated under the Project (see **Figure 4-43**).

As a result of Alternative 2, the number of units to be developed under the implementation of the Amended Housing Element would be 1,074, which meets the minimum RHNA requirement of 724 units. However, the development buffer (423 units) of the Amended Housing Element sites would be reduced to 350 units which would remain adequate to accommodate modifications to the inventory during the 6th Cycle.

Table 4-32 identifies the sites that would be removed from the Opportunity Sites and remain zoned according to their existing zoning designation (Sites 8, 23, 24, 56, 59, 63, 86, 87, 201, 207, and 212).

Comparative Analysis of Environmental Effects

Impacts Identified as Being the Same as or Similar to Those of the Proposed Project

Construction-related vibration impacts would be similar under Alternative 2 compared to the proposed Project (Impact 3.11-2) as sites near historic structures and historic districts would still be anticipated to accommodate residential uses. Vibration from construction equipment still could cause effects on nearby historic buildings. Noise levels would also be similar as the sites removed from development consideration would be small and spread across the city, and no difference in noise levels (Impact 3.11-1 and Impact 3.11-3) under Alternative 2 would be detected.

Similar to the proposed Project, Alternative 2 would not result in unplanned population growth or displacement of persons such that the provision of new housing would be required. The alternative would appropriately plan for population growth in the city, and there would be no impact (Impacts 3.12-1 and 3.12-2).

TABLE 4-~~3~~2: ALTERNATIVE 2 – ~~REDUCED~~ REDUCED SITES

OPP. SITE #	ADDRESS	CURRENT USE	ACRES	EXISTING UNITS ON SITE	EXISTING MAXIMUM CAPACITY	PROPOSED PROJECT UNIT CAPACITY	ALT. 2 UNIT CAPACITY	EXISTING ZONING	PROPOSED PROJECT ZONING	ALT. 2 ZONING	RESTRICTION
Removed Opportunity Sites											
8	Main St./Crescent Ave.	Vacant	0.12	0	2	6	1	R-2-2.5	Housing-49	R-2-2.5	High VMT
23	10 Reade Ln.	Vacant	0.07	0	1	2	1	R-3	Housing-29	R-3	High VMT
24	10 Excelsior Ln.	Vacant	0.08	0	2	2	1	R-3	Housing-29	R-3	High VMT
56	412 Napa St.	Residential	0.23	1	5	10	2	R-3	Housing-49	R-3	High VMT
59	Easterby St.	Vacant	0.12	0	2	6	2	R-2-2.5	Housing-49	R-2-2.5	High VMT
63	Olive St. and Bridgeway Blvd.	Vacant / Office	0.12	0	2	6	1	R-2-2.5	Housing-49	R-2-2.5 CN-1	Landslide 8
86	330 Ebbtide Ave.	Residential	0.75	2	18	34	1	R-3	Housing-49	R-3	Landslide 10
87	Ebbtide Ave.	Vacant	0.17	0	4	8	1	R-3	Housing-49	R-3	Landslide 10
201	605-613 Bridgeway	Vacant	2.3	0	14	15	14	R-1-6 CC	Mixed Use-29/85%	R-1-6 CC	High VMT
207	911-917, 925 Bridgeway	Residential / Underutilized	0.39	2	4	4	1	R-3	Housing-49	R-3	Landslide 9
212	Multiple	Vacant	0.19	0	1	6	1	R-1-6	Housing-70	R-1-6	High VMT
Alt. 2 Units on				**5**	**55**	**99**	**26**				

OPP. SITE #	ADDRESS	CURRENT USE	ACRES	EXISTING UNITS ON SITE	EXISTING MAXIMUM CAPACITY	PROPOSED PROJECT UNIT CAPACITY	ALT. 2 UNIT CAPACITY	EXISTING ZONING	PROPOSED PROJECT ZONING	ALT. 2 ZONING	RESTRICTION
Affected Sites											
TOTAL						**1,147**	**1,074**				

Source: De Novo Planning Group, 2024.

Impacts Identified as Being Less Severe than Those of the Proposed Project

As development potential would be reduced on 11 sites, a slightly smaller total footprint of development would occur. This would result in slight reductions to impacts associated with ground disturbance on Sites 8, 23, 24, 56, 59, 63, 86, 87, 201, 207, and 212. Therefore, Alternative 2 would be slightly less likely to encounter previously unidentified historic, archaeological, paleontological, and tribal cultural resources (Impacts 3.4-2, 3.4-3, 3.4-5, 3.4-6, 3.6-6, and 3.6-7). Light and glare impacts would also be reduced on the 11 sites spread throughout the city.

Alternative 2 includes 1,074 residential units, which in comparison to the proposed Project is a reduction of 73. An assessment of how the residential VMT per capita associated with Alternative 2 would compare to the proposed Project was performed using MAZ (micro analysis zone) outputs from the TAMDM travel demand model projections for the Amended Housing Element, along with the net differences in units that Alternative 2 would yield as compared to the proposed Project. While this approach is less precise than conducting extensive full model runs for the Alternative 2 land use inventory, its balance of quantitative and qualitative information remains valuable in assessing whether the alternative would result in VMT impacts that are less severe, equivalent, or more severe than the proposed Project.

It was determined that the combined Alternative 2 residential units are estimated to generate approximately 1,400 to 2,000 fewer home-based vehicle miles traveled than the combined residential units associated with the proposed Project. However, Alternative 2 would also have fewer units and less population than the project. Upon comparing the average VMT per capita associated with the Alternative 2 units versus the proposed Project units, it was determined that the VMT per capita performance metric would decrease by approximately 0.8 percent. The citywide VMT per capita would therefore be slightly less than, though very similar to, the proposed Project. The modest nature of this effect is likely due to several factors including the relatively low number of units on high-VMT sites that Alternative 2 eliminates, VMT characteristics of sites that were also removed for landslide risks, and overall weighting of the larger pool of remaining sites throughout the city.

While Alternative 2 would only slightly decrease VMT per capita performance metrics, it would also eliminate several of the proposed Project's sites that are located within Sausalito's highest-VMT areas. By doing so it would eliminate the potential for VMT impacts to occur on these individual sites and would also shift some of these units to more VMT-efficient areas of the city. Given these factors, Alternative 2 would be considered to have modestly less severe VMT impacts than the proposed Project, despite only slightly reducing the VMT per capita metric. Alternative 2 would still result in a significant and unavoidable VMT impact.

As VMT levels would decrease, so would the emissions associated with vehicle travel. Therefore, air quality impacts (Impacts 3.2-1 through 3.2-5) and greenhouse gas emissions (Impacts 3.7-1 through 3.7-3) would also be slightly less than the proposed Project.

Growth projections would be lower under Alternative 2 compared to the proposed Project. Therefore, population demand-related impacts would be higher under Alternative 2, including for public infrastructure and utility systems, including water supply systems (Impacts 3.15-1 through 3.15-6) and public services and recreation (Impacts 3.13-1 through 3.13-4).

This alternative would not develop sites that are at high risk of landslides. Therefore, exposure of residents to unstable geological units or effects from seismic events would be lower (Impacts 3.6-1 through 3.6-7) under Alternative 2 compared to the proposed Project.

Exposure of residents to potential hazards would also be slightly lower under Alternative 2 because there would be fewer residents compared to the proposed Project. Likewise, the number of sites to be developed under Alternative 2 would decrease. Impacts would be slightly higher related to hazards and hazardous materials (Impacts 3.8-1 through 3.8-6), hydrology and water quality (Impacts 3.9-1 through 3.9-9), and wildfire (Impacts 3.16-1 through 3.16-6).

Impacts Identified as Being More Severe than Those of the Proposed Project

There are no impacts from the implementation of Alternative 2 that would be greater than the proposed Project.

Relationship to Significant and Unavoidable Impacts

Alternative 2 would have slightly less aesthetics and light impacts as fewer sites would be developed (Impact 3.1-2 and Impact 3.1-5). Fewer new buildings would allow more views to be preserved, and less interior and exterior lighting from new buildings would be created.

While fewer individual potential housing sites are likely to have significant VMT impacts, implementation of Alternative 2 would still be expected to result in a significant and unavoidable VMT impact (Impact 3.14-2 and Impact 3.14-5), the same as the proposed Project.

Alternative 2 would reduce the demand for public utilities including water supplies (Impact 3.15-2 and Impact 3.15-6) as fewer housing units would be developed. Further, it may require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities (Impact 3.15-1), similar to the proposed Project but with a smaller geographic footprint.

Although fewer sites would likely be disturbed during construction activities, Alternative 2 would not eliminate any of the Cultural and Tribal Cultural significant and unavoidable impacts (Impacts 3.4-2, 3.4-3, 3.4-5, and 3.4-6) as previously unidentified Native American resources, archaeological resources, or human remains could still be encountered during construction activities. The potential still exists for historic resources to be impacted during construction activities if construction of new sites were to damage the resource (Impact 3.4-4).

Relationship to Project Objectives

Alternative 2, Reduced Sites would meet the first project objective by updating the General Plan's Housing Element to identify policies and implementation programs to comply with the State's requirement to facilitate the development of more housing. Alternative 2 would also meet the second project objective by establishing an inventory of housing sites with enough capacity to meet the State's RHNA requirements to accommodate 724 units of varying income levels. However, the excess capacity beyond the State-mandated 724 units would be less under Alternative 2 than the proposed Project. Under the proposed Project, there would be an excess capacity of 423 units; under Alternative 2, that excess capacity would be reduced to 350 units.

Alternative 2 would result in the amendment of the relevant General Plan elements to maintain internal consistency, thereby meeting the third project objective. This alternative would also meet the fourth project objective by affirmatively furthering fair housing and preserving the City's character by allowing streamlined development of some sites, but not all of the Opportunity Sites identified by the proposed Project. Therefore, Alternative 2 would meet the Project objectives, but to a lesser degree than the proposed Project.

~~4.4.3~~4.4.4 ALTERNATIVE 3 — MODIFIED SITES

Alternative 3 identifies different sites to be rezoned for residential and mixed-use development through implementation of the Amended Housing Element. The purpose of this alternative is to relocate anticipated residential units from areas that are far from community services or do not have convenient freeway access, and place them closer to community services such as commercial, employment, and neighborhood services, or freeway access. This alternative would not rezone 11 Opportunity Sites to higher density residential or mixed-use, instead keeping those sites as they are currently designated on the existing Zoning Map. The Opportunity Sites that would not be rezoned are sites 8, 9, 10, 55, 56, 59, 63, 75, 101, 212, and 301 (see **Figure 4-54**).

Alternative 3 would include the addition of a new Opportunity Site, formerly known as Opportunity Site 67, to the Housing Element. This 4.36-acre site, located at 2200 Marinship Way, is currently vacant. It is surrounded by surface parking and an office building to the north, another office building to the east, Marinship Park to the south, and Bridgeway to the west. This site would be rezoned from its current designation of Industrial (I) to a new overlay Mixed Use (MU-25/85%), which would create the opportunity to construct up to 109 dwelling units and approximately 9,500 square feet of ground floor mixed use. This site is proximate to community services and is adjacent to a main evacuation route, Bridgeway, in the event of an emergency.

The total number of units that could be accommodated under Alternative 3 is the same as the Amended Housing Element project of 1,147 units.

Table 4-~~4~~3 identifies the sites that would remain zoned according to their existing zoning designation (Sites 8, 9, 10, 55, 56, 59, 63, 75, 101, 212, and 301) and the site that would be added to the Opportunity Sites that would be rezoned to accommodate residential uses (Site 67).

Comparative Analysis of Environmental Effects

Impacts Identified as Being the Same as or Similar to Those of the Proposed Project

Under Alternative 3, units would be reduced on 11 sites and increased on one site. While there would be less disturbance on the 11 scattered sites, there would be disturbance on a new vacant site. As a result, there would still be potential impacts to tribal cultural or archaeological resources, similar to the proposed Project.

Similar to the proposed Project, Alternative 3 would not result in unplanned population growth such that the provision of new housing would be required. The alternative would appropriately plan for population growth in the city, and there would be no impact (Impacts 3.12-1 and 3.12-2).

It is anticipated that Alternative 3 would result in similar levels of ground-disturbance, albeit in different locations, and generally similar impacts associated with the potential to encounter previously unidentified historic, archaeological, paleontological, and tribal cultural resources (Impacts 3.4-2, 3.4-3, 3.4-5, 3.4-6, 3.6-6, and 3.6-7). Light and glare impacts would also be decreased in scattered areas associated with the reduction on the 11 sites, but would be increased at Site 67.

Energy consumption would be similar under Alternative 3 as a similar level of development would be constructed compared to the proposed Project. Further, similar to the proposed Project, energy usage would not be wasteful, inefficient, or unnecessary as units would be constructed to Title 24 standards (Impact 3.5-1).

Growth projections would be similar under Alternative 3 compared to the proposed Project because only a few sites would be removed from the inventory. Therefore, population demand-related impacts would be similar under Alternative 3, including for public infrastructure and utility systems, including water supply systems (Impacts 3.15-1 through 3.15-6) and public services and recreation (Impacts 3.13-1 through 3.13-4). Exposure of residents to potential hazards would also be similar under Alternative 3. Impacts would be similar, or slightly reduced, related to geology and seismicity (Impacts 3.6-1 through 3.6-7) and wildfire (Impacts 3.16-1 through 3.16-6) as several sites on steep slopes would have reduced development potential and development would be slightly reduced in areas with higher fire hazards and increased in areas with less hazards.

Construction-related vibration impacts would be similar under Alternative 3 compared to the proposed Project (Impact 3.11-2) as sites near historic structures would still be anticipated to develop with residential uses. Construction and operational noise levels would increase

near Site 67 as that site was not previously anticipated to redevelop (Impact 3.11-1); however, this site is not adjacent residential uses and impacts are anticipated to be similar or less for sensitive receptors.

Impacts Identified as Being Less Severe than Those of the Proposed Project

The changes under Alternative 3 have been crafted to reduce VMT and associated air quality and greenhouse gas emissions.

The process used to assess how Alternative 3 would be likely to perform from a VMT perspective is the same as that previously described for Alternative 2. Alternative 3 would include 1,147 total units, which is equal to the proposed Project. Compared to the proposed Project, Alternative 3 would eliminate 109 units on 11 sites and add 109 units, with at least 85% of units affordable to lower and moderate income households, and non-residential uses at a new site at 2200 Marinship Way.

Review of the resulting VMT estimates indicates that the units comprising Alternative 3 would be expected to have an average VMT per capita that is approximately 1.1 percent less than the Project. Alternative 3 would decrease the number of market-rate units, increase the number of lower income units, and provide an increase in mixed uses, all of which are characteristics that also tend to lower per capita VMT. With respect to the total home-based VMT generated, the combined Alternative 3 residential units are estimated to generate approximately 2,000 to 3,000 fewer home-based vehicle miles traveled than the combined residential units associated with the proposed Project.

As with the proposed Project, Alternative 3 would exceed the applied significance threshold of 12.6 VMT per capita. Mitigation Measure 3.14-2 would therefore still apply. As discussed below and in the discussion of the proposed Project's VMT impacts, there is uncertainty as to whether all Alternative 3 sites can achieve significance thresholds, even with mitigation. The impact is therefore considered significant and unavoidable.

While Alternative 3 would be expected to result in a significant and unavoidable VMT impact, the VMT per capita associated with its residential units as well as its effects on citywide VMT per capita are anticipated to be slightly less than the proposed Project. Accordingly, the VMT impacts associated with Alternative 3 would be slightly less severe than those associated with the project.

As per capita VMT levels would decrease, so would the emissions greenhouse gas emissions, which are associated with vehicle travel and also considered on a per capita basis. Therefore, greenhouse gas emissions (Impacts 3.7-1 through 3.7-3) would also be slightly less than the proposed Project.

Impacts Identified as Being More Severe than Those of the Proposed Project

None.

TABLE 4-~~43~~: ALTERNATIVE 3 – ~~MODIFIED~~ MODIFIED SITES

OPP. SITE #	ADDRESS	CURRENT USE	ACRES	EXISTING UNITS ON SITE	EXISTING ZONING UNIT CAPACITY	PROPOSED PROJECT UNIT CAPACITY	ALT. 3 UNIT CAPACITY	EXISTING ZONING	PROPOSED PROJECT ZONING	ALT. 3 ZONING
Removed Opportunity Sites										
8	Main St./Crescent Ave.	Vacant	0.12	0	2	6	2	R-2-2.5	Housing-49	R-2-2.5
9	Lower Crescent Ave.	Vacant	0.18	0	1	8	1	R-2-2.5	Housing-49	R-2-2.5
10	18 West Ct.	Vacant	0.08	0	1	3	1	R-2-2.5	Housing-49	R-2-2.5
55	Napa St	Multifamily	0.17	2	2	8	2	R-3	Housing-49	R-3
56	412 Napa St	Single Family	0.23	1	5	10	5	R-3	Housing-49	R-3
59	Easterby St.	Vacant	0.12	0	2	6	2	R-2-2.5	Housing-49	R-2-2.5
63	522 Olive St.	Vacant	0.12	0	2	6	2	R-2-2.5	Housing-49	R-2-2.5
75	530 Nevada St. and Tomales St.	City Corp Yard	0.61	0	0	31	0	PI	Housing-70	PI
101	357 Sausalito Blvd.	Vacant / Residential	0.37	7	4	16	4	R-2-5 R-1-6 R-2-2.5	Housing-49	R-2-5 R-1-6 R-2-2.5
212	Sausalito Blvd.	Vacant	0.12	0	1	6	1	R-1-6	Housing-49	R-1-6
301	Locust Ave/Humbold St	Industrial/Commercial	0.99	0	0	29	0	CW	Housing-29	CW
Added Sites										
67	2200 Marinship Way	Vacant/ Office	4.36	0	0	0	109	I	I	MU-25/5%

OPP. SITE #	ADDRESS	CURRENT USE	ACRES	EXISTING UNITS ON SITE	EXISTING ZONING UNIT CAPACITY	PROPOSED PROJECT UNIT CAPACITY	ALT. 3 UNIT CAPACITY	EXISTING ZONING	PROPOSED PROJECT ZONING	ALT. 3 ZONING
Alt. 3 Units on Affected Sites					**12**	**129**	**129**			
TOTAL						**1,147**	**1,147**			

Source: De Novo Planning Group, 2024.

Relationship to Significant and Unavoidable Impacts

Aesthetics and light impacts would be similar under Alternative 3 as to the proposed because the same number of units would be constructed (Impact 3.1-3 and Impact 3.1-5).

Alternative 3 would not eliminate any of the Cultural and Tribal Cultural significant and unavoidable impacts (Impacts 3.4-1 through 3.4-6) as previously unidentified resources could still be encountered during construction activities.

As described above, the resulting VMT estimates indicates that the units comprising Alternative 3 would be expected to have an average VMT per capita that is approximately 1.1 percent less than the Project due to the sites' likely makeup of market-rate and low income units. Although some individual sites may be below the applicable VMT threshold, and while it is reasonable to assume that future development projects on many of the project sites will either screen from VMT or analysis or be able to achieve the required VMT reductions required by Mitigation Measure 3.14-2, full mitigation may not be possible on all sites, particularly those in higher-VMT areas beyond the reach of transit. Given the inability to assure that all Alternative 3 sites will be able to achieve VMT significance thresholds, the impact would remain significant and unavoidable, same as the proposed Project.

Alternative 3 would increase the demand for public utilities including water supplies (Impact 3.15-2 and Impact 3.15-6) because more housing units would be constructed. The alternative may require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities (Impact 3.15-1), similar to the proposed Project, but over a smaller geographical area.

Relationship to Project Objectives

Development under Alternative 3 would achieve the first project objective of updating the General Plan to comply with State-mandated requirements. Identical to the proposed Project, Alternative 3 would result in the capacity for 1,147 housing units, or 423 more dwelling units than the RHNA-required minimum of 724 units at the income units mandated by State law. The provision of these units would meet the second project objective. Further, Alternative 3 would amend the General Plan to identify rezoned sites, and make appropriate consistency revisions to ensure that the General Plan and zoning code are in sync.

Alternative 3 would not meet the fourth project objective. Alternative 3 would eliminate rezoning at locations that are farther from community services or do not have convenient freeway access, thereby concentrating housing in already more densely populated areas along Marinship. Housing would not be evenly spread throughout the city, and may affect the aesthetic of the working waterfront.

~~4.4.4~~4.4.5 ALTERNATIVE 4 – HISTORIC PRESERVATION

Alternative 4 would focus on preserving properties located within and adjacent to the Sausalito Downtown Historic District (see **Figure 4-~~6~~5**). The purpose of this alternative is to ensure that future development would not adversely affect known historic resources or properties, particularly those in the Downtown Historic District. The city has a rich history and there are City of Sausalito Historic Landmarks, , a National Parks Service Certified Historic District, properties within the Certified Historic District listed on the California Register of Historic Resources, properties within the Certified Historic District eligible for the National Register of Historic Resources, ~~potentially eligible historic properties,~~ and properties eligible for listing~~ed~~ on the National Register of Historic Places and/or California Register of Historic Resources located throughout the city, and accommodating the City's housing needs while preserving the character of the City, including its historic resources, is an objective of the Project. However, this alternative geographically focuses on those parcels where intensification of development could affect resources within the Downtown Historic District either through interruption of the historic character of the area due to building design or increased building heights and mass, or potential vibration impacts of site development which could adversely affect historic structures.

The Amended Housing Element identifies five properties anticipated to accommodate additional residential development which are within or adjacent to the Downtown Historic District:

- Opportunity Site 201 is within the Downtown Historic District and currently consists of a commercial building with four retail storefronts, and a surface parking lot;. Opportunity Site 201 (APN 065-132-16) contains the Marin Fruit Co., a designated historic resource listed on the California Historic Preservation Office state registry and listed on the California State Parks Built Environment Resource Directory (BERD).[2]
- Amended Housing Element Inventory Site, located at 721/729 Bridgeway, is within the Downtown Historic District and contains a commercial building~~;~~.
- Opportunity Site 23 is adjacent to, but outside of, the Downtown Historic District, and is currently vacant~~;~~.
- Opportunity Site 24 is adjacent to, but outside of, the Downtown Historic District, and is currently vacant~~; and~~.
- Opportunity Site 202 is adjacent to, but outside of, the Downtown Historic District and currently houses the Alta Mira Recovery Programs surface parking lots and two small buildings.

The removal of these rezone sites helps preserve the character of the historic area by not inviting redevelopment or densification through rezoning. The historic context of the district can remain intact. There are several buildings in the Downtown Historic District that are

[2] California State Parks, 2024. Built Environment Resource Directory (BERD). Resources by County: Marin County. Available: https://ohp.parks.ca.gov/?page_id=30338. Accessed: November 19, 2024.

potentially eligible historic properties. Demolition of existing buildings, construction of new housing units, vibration from heavy construction equipment, or construction mishaps on an Amended Housing Element site could adversely impact an existing adjacent historic resource. Opportunity Site 201 and the Inventory Site within the Downtown Historic District are the two sites that are most likely to unintentionally damage a potentially eligible historic resource.

Opportunity Sites 23, 24, and 202 are adjacent to the Downtown Historic District. Removing the sites adjacent to the Downtown Historic District would allow those sites to be retained as a type of transition zone from the historic district to other redeveloped, densified parts of the city.

Table 4-54 identifies the current and planned uses for each of the sites, as well as the anticipated housing unit counts.

TABLE 4-5~~4~~

: ALTERNATIVE 4 – HISTORIC PRESERVATION

OPP. SITE #	ADDRESS	RESTRICTION	CURRENT USE	ACRES	EXISTING UNITS ON SITE	EXISTING ZONING UNIT CAPACITY	PROPOSED PROJECT UNIT CAPACITY	ALT. 4 UNIT CAPACITY	EXISTING ZONING	PROPOSED PROJECT ZONING	ALT. 4 ZONING
Sites That Would Not be Rezoned											
201	605-613 Bridgeway Blvd	Within Downtown Historic District	Commercial building, including Real Napa	0.55	1	14	15	1	CC Central Commercial	Mixed Use-29/85%	CC Central Commercial
Inventory Site	721/729 Bridgeway	Within Downtown Historic District	Commercial-Improved		2		3	2	CC Central Commercial	CC Central Commercial	CC Central Commercial
23	10 Reade Lane	Adjacent to Downtown Historic District	Vacant	0.07	0	1	2	0	R-3 High Density Residential	Housing-29	R-3 High Density Residential
24	10 Excelsior Lane	Adjacent to Downtown Historic District	Vacant	0.08	0	2	2	0	R-3 High Density Residential	Housing-29	R-3 High Density Residential
202	125 Bulkley	Adjacent to Downtown Historic District	Alta Mira Recovery Programs parking lot and two small buildings	1.19	0	32	84	0	R-3 High Density Residential	Housing-70	R-3 High Density Residential
Alt. 4 Units on							**106**	**3**			

Affected Sites											
TOTAL							**1,147**	**1,044**			
Source: De Novo Planning Group, 2024.											

Comparative Analysis of Environmental Effects

Impacts Identified as Being the Same as or Similar to Those of the Proposed Project

Under Alternative 4, units would be reduced on five sites. It is anticipated that Alternative 4 would result in slightly less levels of ground-disturbance, and generally lesser impacts associated with the potential to encounter previously unidentified historic, archaeological, paleontological, and tribal cultural resources (Impacts 3.4-2, 3.4-3, 3.4-5, 3.4-6, 3.6-6, and 3.6-7). Light and glare impacts would also be decreased in scattered areas associated with the reduction on the five sites.

Similar to the proposed Project, Alternative 4 would not result in unplanned population growth such that the provision of new housing would be required. The alternative would appropriately plan for population growth in the city, and there would be no impact (Impacts 3.12-1 and 3.12-2).

Energy consumption would be slightly less under Alternative 4 as fewer units would be constructed compared to the proposed Project. Further, similar to the proposed Project, energy usage would not be wasteful, inefficient, or unnecessary as units would be constructed to Title 24 standards (Impact 3.5-1).

Growth projections would be slightly less under Alternative 4 compared to the proposed Project as there would be fewer units and population. Therefore, population demand-related impacts would be slightly less under Alternative 4, including for public infrastructure and utility systems, including water supply systems (Impacts 3.15-1 through 3.15-6) and public services and recreation (Impacts 3.13-1 through 3.13-4). Exposure of residents to potential hazards would also be similar under Alternative 3. Impacts would be similar, or slightly reduced, related to geology and seismicity (Impacts 3.6-1 through 3.6-7) and wildfire (Impacts 3.16-1 through 3.16-6) as fewer units would be constructed.

Construction-related vibration impacts would be similar under Alternative 4 compared to the proposed Project (Impact 3.11-2) as sites near historic structures would not be anticipated to develop with residential uses.

Impacts Identified as Being Less Severe than Those of the Proposed Project

Alternative 4 includes 103 fewer residential units than the proposed Project, with the decreased unit inventory occurring within and adjacent to the historic downtown area. Using MAZ outputs from the TAMDM travel demand model VMT projections in tandem with the net differences in units, an assessment of how the residential VMT per capita associated with Alternative 4 would compare to the proposed project was performed.

It is estimated that Alternative 4 would generate approximately 1,300 to 1,800 fewer home-based vehicle miles traveled than the proposed Project. However, Alternative 4 would also have fewer units and less population than the Project. Upon comparing the estimated Citywide VMT per capita associated with Alternative 4 versus the proposed Project, it was

determined that Alternative 4 would be approximately 0.8 percent higher. The difference in Citywide VMT per capita associated with Alternative 4 is likely attributable to fewer added units in the downtown area of Sausalito where residential trip lengths tend to be lower than the citywide average. In other words, fewer units are added to location-efficient areas with Alternative 4 than the proposed Project, leading to slightly higher VMT per capita levels. It is also noted that compared to the proposed Project, Alternative 4 results in fewer units within one-half mile of the Sausalito Ferry terminal, which is an area where certain residential projects may qualify for VMT "screening" and presumed less-than-significant VMT impacts. Accordingly, fewer of the units associated with Alternative 4 are likely to qualify for VMT screening than with the Project.

In summary, the residential VMT impacts associated with Alternative 4 are likely to be slightly worse than the proposed Project, though the difference would be very small. Implementation of Alternative 4 would still result in a significant and unavoidable VMT impact.

Impacts Identified as Being More Severe than Those of the Proposed Project
None.

Relationship to Significant and Unavoidable Impacts

Aesthetics and light impacts would be similar under Alternative 3 as to the proposed Project, except that localized aesthetics impacts immediately within and adjacent to the Sausalito Downtown Historic District may be slightly less (Impact 3.1-3 and Impact 3.1-5).

Impacts to historic resources would be less as no sites within or adjacent to the Sausalito Downtown Historic District would be rezoned (Impact 3.4-1). However, Alternative 4 would not eliminate any of the Cultural and Tribal Cultural significant and unavoidable impacts (Impacts 3.4-1 through 3.4-6) as previously unidentified resources could still be encountered during construction activities.

As described above, the resulting VMT estimates indicates that the units comprising Alternative 4 would be expected to generate approximately 1,300 to 1,800 fewer home-based vehicle miles traveled than the proposed Project. Upon comparing the estimated Citywide VMT per capita associated with Alternative 4 versus the proposed project, it was determined that Alternative 4 would be approximately 0.8 percent higher. The difference in Citywide VMT per capita associated with Alternative 4 is likely attributable to fewer added units in the downtown area of Sausalito where residential trip lengths tend to be lower than the citywide average. Therefore, Alternative 4 would have slightly worse VMT impacts than the proposed Project.

Alternative 4 would decrease the demand for public utilities including water supplies (Impact 3.15-2 and Impact 3.15-6) because fewer housing units would be constructed. The alternative may require or result in the relocation or construction of new or expanded water,

wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities (Impact 3.15-1), similar to the proposed Project, but over a smaller geographical area.

Relationship to Project Objectives

Alternative 4, Historic Preservation, would meet the first project objective by updating the General Plan's Housing Element to identify policies and implementation programs to comply with the State's requirement to facilitate the development of more housing. Alternative 4 would also meet the second project objective by establishing an inventory of housing sites with enough capacity to meet the State's RHNA requirements to accommodate 724 units of varying income levels. However, the excess capacity beyond the State-mandated 724 units would be less under Alternative 4 than the proposed Project. Under the proposed Project, there would be an excess capacity of 423 units; under Alternative 4, that excess capacity would be reduced to 320 units. Because fewer sites would be rezoned, and fewer units could be constructed, Alternative 4 does not meet the second project objective as well as the proposed Project.

Alternative 4 would result in amendments to the General Plan to maintain internal consistency across elements, similar to the proposed Project.

This alternative would also meet the fourth project objective by affirmatively furthering fair housing and preserving the City's character by allowing streamlined development of some sites, but not all of the Opportunity Sites identified by the proposed Project. In particular, sites adjacent to or within the Downtown Historic District would not be rezoned to higher densities. This would preserve the character and historic nature of the Downtown Historic District, and would reduce aesthetic impacts, keeping building heights, materials, and densities largely as they currently exist.

4.4.6 ALTERNATIVE 5 – MODIFIED PROJECT

Alternative 5 would slightly reduce development potential in the northern portion of the City to preserve the existing setting. This would include several adjustments to ensure accommodation of the RHNA. Under this alternative, 3 scenarios are possible:

- **Scenario 1** – The development of Site 84 (MLK Property) would be decreased by reducing the number of units from 94 to 80 units. This would reduce the building heights and density to diminish impacts on aesthetics. Scenario 1 would require passage of a ballot measure to authorize development of the MLK Property in light of restrictions in Ordinance No. 1128.

- **Scenario 2 –** The development of Site 84 would be further reduced by decreasing the number of units from 94 units to 50 units. This would reduce the building heights and density to diminish impacts on aesthetics. Scenario 2 would also require passage of a ballot measure.

- **Scenario 3 –** Site 84 would not be developed. This would not only reduce the building heights and density to diminish impacts on aesthetics, but also preserve community resources. If, under Scenario 3, the vote authorizing the lifting of restrictions in Ordinance 1128 fails to pass, Site 202's minimum number of units would be increased and Site 14 (Spencer Avenue Fire Station) and Site 52 (City Hall parking lot) would then be rezoned to accommodate up to 20 to 25 units each. This would ensure accommodation of the RHNA.

Development on Site 14 and/or Site 52 could potentially also occur if needed to ensure no net loss of capacity in the City's sites needed to accommodate the unmet portion of the City's RHNA as required by Government Code Section 65863.

Each of these scenarios provides flexibility in accommodating the RHNA, while also reducing development in the northern portion of the City. **Table 4-6** identifies the current and planned uses for each of the sites under Alternative 5, as well as the anticipated housing unit counts. **Figure 4-7** shows which parcels would be rezoned under Alternative 5, and identifies Site 14 and Site 52 which could be developed in the event of a RHNA shortfall. For purposes of the analysis below, Alternative 5 assumes a conservative maximum by analyzing Site 84 under Scenario 1 and the potential use of Site 14 and Site 52 under Scenario 3.

TABLE 4-6: ALTERNATIVE 5 – MODIFIED PROJECT

OPP. SITE #	ADDRESS	CURRENT USE	ACRES	EXISTING UNITS	EXISTING ZONING UNIT CAPACITY	PROPOSED PROJECT UNIT CAPACITY	ALT. 5 UNIT CAPACITY			EXISTING ZONING	PROPOSED PROJECT ZONING	ALT. 5 ZONING
							SCENARIO 1	SCENARIO 2	SCENARIO 3			
Revised Site Approach												
84	100 Ebbtide Ave	MLK Parkroperty		0	0	94	80	50	0	CC Central Commercial	Mixed Use-49/85%	Mixed Use-49/85%
202	125 Bulkley	Alta Mira Recovery Programs parking lot and two small buildings	1.19	0	32	84	84	84	84 (no change to maximum units, increase minimum density to 64 du/ac to increase realistic capacity to 75 units)	R-3 High Density Residential	Housing-70	Housing-70
303	1 & 3 Harbor	The Harbors office buildings		0	0	147	147 (no change to maximum units, increase very low and low income units)	147 (no change to maximum units, increase very low and low income units)	147 (no change to maximum units, increase very low and low income units)	I Industrial	Mixed Use-49/85%	Mixed Use-49/85%
New Sites												
14	300 Spencer Ave	Former Fire Station		0	0	0	0	0	20 - 25	PI Public Institutional	-	Mixed Use-29/85%
52	420 Litho Street	City Hall (site does not include	2.2	0	0	0	0	0	20 - 25	PI Public Institutional	-	Mixed Use-29/85%

		Robin Sweeny Park)										
TOTAL NET NEW UNITS ON AFFECTED SITES						**325**	**311**	**281**	**271 - 281**			
TOTAL						**1,147**	**1,133**	**1,103**	**1,093 – 1,103**			

Source: De Novo Planning Group, 2024.

Introduction

The analysis for Alternative 5 is prepared at a similar level as the proposed Project. This analysis does not repeat the Existing Setting, Regulatory Setting, or Thresholds of significance described in each technical section of Chapter 3, as the data in each of those sections applies equally to Alternative 5, and no changes would be needed to update those discussions to address Alternative 5. However, this analysis does focus on the impact analysis, impacts, and mitigation measures for each of the technical areas, providing a comparison of impacts anticipated under Alternative 5 to those identified for the proposed Project. The analysis below for Alternative 5 includes a discussion on:

- ***Analysis, Impacts, and Mitigation Measures*** describes the methodology used in assessing potential impacts of the Amended Housing Element and contains an analysis of direct and indirect impacts from construction, operation, and maintenance activities related to future development that could occur under the Amended Housing Element. A cumulative analysis for each potential impact will also be included in this section. The geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, city, planning area, county, watershed, or air basin) will be identified; an analysis conducted evaluating the cumulative effect, and a determination about the Amended Housing Element project's contribution to that effect.

  For each impact identified, including cumulative impacts, a level of impact will be described using the following categories:
  - **Significant** impacts include a description of the circumstances where an established or defined threshold would be exceeded.
  - **Less than significant** impacts include effects that may be noticeable, but do not exceed established or defined thresholds. Potentially significant impacts that are mitigated to a less-than-significant level by mitigating programs, actions, or other factors are also included in this category.
  - **No impact** describes circumstances where there is no adverse effect on the environment.

Aesthetics

Information regarding the existing setting, regulatory setting, and thresholds of significance for Aesthetics impacts can be found on pages 3.1-1 through 3.1-14 in Section 3.1, Aesthetics, of the Draft EIR.

Impact 4.5-1 Implementation of Alternative 5 would have a substantial adverse effect on a scenic vista. (See Impact 3.1-1 for Project impacts related to this topic)

Similar to the Project, development accommodated by rezoning under Alternative 5 would result in additional residential development throughout the City. Although most development is anticipated to occur on vacant and/or underutilized existing parcels as shown in Figure 4-6, the potential for infill growth could occur in other locations within the fabric of developed areas throughout the city. The potential growth areas in relation to view corridors, scenic resources, and natural features are shown on Figure 3.1-2. A key tenet of Sausalito's approach to identifying sites to address its lower income housing needs would be through the creation of new overlay zones that could significantly increase permitted residential densities. As shown in Table 2-3 in Chapter 2.0, Project Description, three housing Opportunity Site overlays and three mixed use Opportunity Site overlays would result in increased densities compared to the current maximum densities permitted by the existing zoning ordinance. Additionally, these proposed overlays would result in increased lot coverage, building heights, and building mass compared to the current development permitted by the existing zoning ordinance. Maximum building heights would range from 32 feet to 45 feet. The previous maximum building height was three stories (32 feet) and most buildings in the City are three stories or less currently.

Under Alternative 5, development would be similar to the Project, with modifications to Site 84 and the addition of Sites 14 and 52. The anticipated number of units on Site 14 and Site 52 would be 20-25 each, resulting in a realistic maximum building height potential of 32 feet, or approximately three stories, similar to the Housing-29 and MU-29/85% designations under the Project. With the reduction in units on Site 84, it is possible that building heights on that Opportunity Site 84 could be lower than 45 feet, compared to the proposed Project.

Development under the Project could alter existing views that are identified by the Sausalito General Plan and Sausalito Municipal Code, including views of ridgelines, Richardson Bay, bridges, distant cities, and land masses beyond the open waters such as Mount Tamalpais, Strawberry Point, Tiburon, Belvedere, Angel Island, East Bay, or the City of San Francisco. Alternative 5 anticipates development of the sites identified for the Project, with the potential to accommodate a portion of housing needs on Sites 14 and 52. Under both the Project and Alternative 5, existing views of scenic vistas, including "primary views", "secondary views", and "public views", as defined in Chapter 10.88 of the Municipal Code, could be altered as a result of development due to future residential building placement, building heights, building size, and introduction of new developed features, including residential and mixed use buildings, parking, and landscaping. These include views from existing residences and public right-of-way. It is noted, however, that CEQA does not address impacts related to private views.

Similar to the Project, development under Alternative 5 would include the Inventory Sites and Opportunity Sites identified as well as additional accessory dwelling units and junior

accessory dwelling units on sites with existing residential uses or that are designated to allow residential uses and single family or duplex units in the single family residential zones under SB 9. Both the Project and Alternative 5 would provide for the creation of Objective Design and Development Standards (ODDS), discussed in Chapter 2. The ODDS would allow applicants of multifamily or mixed use projects with two or more units that are eligible for streamlined review under State law or proposed on Opportunity Sites to be processed pursuant to the standards identified in the ODDS and thus not be subject to the processing requirements, standards, findings, and conditions identified in Sausalito Municipal Code Title 10. Both the Project and Alternative 5 would accommodate higher densities and increased intensity of development, including building heights, building mass, and lot coverage compared to the existing and typical scale of development in Sausalito.

Existing views of Sausalito's waterfront and hillside development, with the backdrop of ridgelines and open space, views of open space areas throughout and adjoining the Planning Area, and views of the waterfront, Richardson Bay, Angel Island, and lands across the Bay may be obscured and reduced by the introduction of development accommodated under the Project and Alternative 5, with Alternative 5 also introducing changes to the views in the vicinity of Sites 14 and 52.

For example, development occurring within the sites currently designated as Very Low Density Residential have the potential to impact views of Wolfback Ridge, a designated scenic ridgeline under the General Plan. For example, depending on the ultimate building heights, massing, and locations, future development of residential structures east of Wolfback Ridge could partially obstruct views of the Ridge. Additionally, future development under Alternative 5, such as Opportunity Sites 3, 101, and 73 under the Project as well as Site 14 under Alternative 5, Inventory Sites, as well as additional accessory dwelling units and junior accessory dwelling units on sites with existing residential uses or that are designated to allow residential uses, could obstruct or alter views of South Ridge, Wolfback Ridge, and Cypress Ridge. The degree of view obstruction or view alteration of the Bay and ridgelines would depend on the ultimate building size and height.

Additionally, development under Alternative 5 could alter existing view corridors identified by the Marinship Specific Plan. For example, future development of Opportunity Sites 39, 47, 301, 401, 303, 72, 211, 402, and 306, all located east of Bridgeway, could obstruct or alter views of Richardson Bay. The reduced unit count on Site 84 to 80 units could improve views of Richardson Bay from west of MLK Property because there would be a reduction in building mass and the height of a portion of the buildings on the site could be lower than 45 feet. The potential for a further reduction to 50 units would further decrease building mass and would likely result in building heights of 32 feet or less. Further, if no units are developed on Site 84, views could be maintained as they are now, with no effect on views to or from Site 84.

Development along Bridgeway and between Harbor Drive and Gate 5 Road, such as Opportunity Sites 72, 211, 303, and 306, would be within two Marinship View Corridors,

including View Corridor 12 (Coloma Street) and View Corridor C (Harbor Drive). Those Opportunity Sites are either currently vacant or have structures that do not fully utilize the parcel. Alternative 5 would have no change to development potential in this area; neither Site 14 or Site 52 are within an identified View Corridor.

Other areas with public vantage points include areas immediately east of Highway 101, where the topography slopes upward toward Highway 101 and the GGNRA. These areas sometimes provide views of Richardson Bay and the Sausalito waterfront; however, these public views can be limited by existing structures. In some of the less developed areas, existing development occurs at lower densities, which allows for unfettered views across open areas and promotes the natural setting of many areas.

As discussed below, mandatory compliance with design review regulations and policies in the Sausalito Municipal Code and General Plan would reduce aesthetic impacts from new development at the vacant parcels, Inventory Sites, Opportunity Sites proposed for rezoning under both the Project and Alternative 5, as well as additional accessory dwelling units and junior accessory dwelling units on sites with existing residential uses or that are designated to allow residential uses. However, the increased building heights allowed by the proposed overlays would result in conflicts with some of these Municipal Code and General Plan regulations.

As the City receives development applications, it will review those applications under the various procedures in the Municipal Code. In addition, all development would be required to comply with the policies and programs of the General Plan designed to protect view corridors, scenic resources, and natural features.

As part of the development review process, the Sausalito Municipal Code imposes rules and regulations to maintain the natural environment and to ensure that new development is consistent and compatible with the city's established character and preserves views. Chapter 11.12 establishes that vegetation must not unreasonably obstruct views from or sunlight reaching other property, and outlines procedures for making view claims. Chapter 10.40 contains general development regulations to guide the location, design and development of new land uses and structures and the alteration of existing uses and structures. In addition, allowable land uses and development standards are defined for each zoning district, including Open Space and Public Districts (Chapter 10.20), Residential Zoning Districts (Chapter 10.22), Commercial Zoning Districts (Chapter 10.24), Industrial Marinship District (Chapter 10.26), and Overlay Districts (Chapter 10.28). However, while Title 10 would continue to apply to Inventory Sites that do not propose development under the ODDS, ADUs, and JADUs, future development of Opportunity Sites and sites proposing projects under the ODDS, would be subject to the standards of the ODDS.

When development applications are received, compliance with applicable policies and programs included in the General Plan will further ensure that potential impacts to view corridors, scenic resources, and natural features are reduced to the extent feasible.

However, due to the housing site locations and allowed building heights, compliance with these policies and programs would not reduce potential impacts to a less-than-significant level. Policy CD-1.3 establishes a maximum height limit for all structures in the City of Sausalito and explicitly recognizes that maximum height is not guaranteed for development proposals where view preservation, shadow studies, and scale is an issue. Both the Project and Alternative 5 would directly conflict with this policy as a result of the recommended increases in building heights to four stories in select overlay zones and for projects eligible to be processed pursuant to Municipal Code Title 10A (ODDS). Policy CD-3.2 requires that new and significantly remodeled structures and other private and public improvements be located and designed with consideration for their impact on significant public views and view corridors. Program CD-3.2.1 requires the city to analyze, through a design review process, project submittals for new and significantly remodeled structures and landscaping for their impact on views from major public vantage points. Program CD-3.2.2 requires the city to develop and maintain a citywide map that identifies priority public viewpoints that should be considered for mandatory preservation. In addition to policies regarding residential development, Program CD-5.1.1 recognizes the importance of public views and encourages the location and design of public improvements in order to minimize impacts on public vantage points and view corridors.

In order to integrate structures with the natural environment and protect natural features, the city includes policies and programs to guide the design of future residential and non-residential developments. Policy CD-2.1 of the General Plan requires that any disturbance to the natural terrain be minimized and that natural site features be maintained and enhanced. Program CD-2.1.2 requires the city to consider how each proposed project integrates with its natural environment through the design review process. Policy CD-2.2 requires the city to give special attention to the design considerations for proposed development on steeply sloped sites. Program CD-2.2.2 requires the city to develop illustrative design guidelines to provide general guidance for construction on steep slopes, including considering design review when average gradient of property exceeds 40 percent.

The design review process must also consider the particular design standards and objective guidelines developed for each commercial sub-area, including Caledonia Street, Central Waterfront, Downtown, Downtown Waterfront, Marinship, and Southern Waterfront, as required in Program CD-4.3.1, as follows:

> **Sub-Area Design.** Design standards and objective guidelines for the commercial sub-areas should be guided by the following:
>
> a. **Caledonia Street:** Maintain and enhance the pedestrian streetscape and promote design compatibility with existing historical, commercial, and residential structures.
>
> b. **Central Waterfront (Napa Street to Spinnaker Point):** Balance commercial structures with recreational facilities and open space (water/view) enjoyment;

encourage enlargement and enhancement of Dunphy Park; and expand public access to waterfront sites.

c. **Downtown:** Maintain and enhance the pedestrian oriented streetscape, promote design compatibility with historical structures, and recognize the needs of retailers in making design decisions.

d. **Downtown Waterfront (Spinnaker Point to Princess Street):** Balance the open water views with public amenities, provide efficient and continuous pedestrian access along and to the water, and investigate the enlargement and enhancement of the Vina Del Mar Park area.

e. **Marinship:** Encourage the development of all industrial, commercial, and institutional sites to be as visually attractive as possible consistent with functionality.

f. **Southern Waterfront (Princess Street to City Limits):** Maintain a primarily open, unobstructed visual character of this area.

Lastly, Program EQ-2.3.2 requires the city to encourage aesthetically designed public facilities (e.g., power lines, water lines, water tanks) with appropriate placement, adequate setbacks, and proper landscaping to reduce aesthetic impacts and impacts on views of hillsides, ridgelines, open space, and Richardson Bay.

In addition, the General Plan includes policies and programs designed to preserve riparian habitat and other sensitive natural communities, which would in turn maintain aesthetic quality of creeks within urbanized areas. Policy W-4.2 requires preservation and enhancement of the open waters and ecosystems of Richardson and San Francisco bays. Policy W-4.3 calls for preservation of undeveloped open shoreline. Policy EQ-4.6 promotes preservation of the natural integrity of creeks and riparian habitat. Future development in accordance with Alternative 5 would be subject to these General Plan policy requirements.

There are no specific development projects that would be entitled or approved as part of Alternative 5. However, the Housing Element increases densities and would accommodate a range of residential and mixed use projects. Projects proposed on Opportunity Sites and other projects eligible to be processed pursuant to the ODDS would not go through the City's current design review process and would go through a separate review process that considers the project's design and features as identified by the ODDS. This process accommodates higher densities than currently envisioned by the General Plan, including the Land Use Element, and the Zoning Ordinance and projects may result in obstruction of views and conflicts with the natural resources on the site in order to accommodate the densities allowed under the Opportunity Site overlay districts and the ODDS, as described in Chapter 2.

In conclusion, development at the vacant parcels, infill parcels, Inventory Sites, Opportunity Sites envisioned by both the Project and Alternative 5, as well as additional accessory dwelling units and junior accessory dwelling units on sites with existing residential uses or

that are designated to allow residential uses could result in an increase in new residential and mixed use development that could incrementally alter scenic resources and natural features within the Planning Area or alter views of scenic resources and natural features within the immediate Planning Area, including ridgelines, hillsides, open space, waterfront, and parks, as well as views of the open waters of the Bay and land masses beyond the open waters, as seen from streets and paths, special vantage points, and views from public properties. Under Alternative 5, the development of Site 14 would obscure views of the ridgeline more than under the Project and the development of Site 52 would obscure views of the Richardson Bay area, while the lessening of development on Site 84 would improve views of the waterfront. While the General Plan policies and programs and development and design standards in the Sausalito Municipal Code which apply to future residential development projects would reduce impacts by encouraging the conservation of scenic vistas, to the extent that such policies and standards are applicable to future projects, these policies and regulations are not adequate to ensure that these potential impacts under the Project or under Alternative 5 would be less than significant. Due to the allowed densities, building heights, building mass, and lot coverage anticipated to be necessary to accommodate the densities and development that would be allowed under the Project and Alternative 5, many of these potential future buildings would be out of character with the rest of the City. In turn, these buildings could potentially block or reduce existing views of scenic vistas, including views from the Planning Area to Richardson Bay and lands beyond the Bay, views from the Planning Area of scenic ridgelines, hillsides, open space, waterfront, and parks, and views from the Bay of the City, and views along the Marinship view corridors. As such, this impact would be ***potentially significant.***

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
None Feasible

Level of Significance after Mitigation
Significant and Unavoidable

As with the Project, Alternative 5 would include two new overlay districts, Housing-29 and Mixed Use-29/85% that limit residential development in several areas along the waterfront and along the Bridgeway corridor; these districts have been included to reduce densities and building heights in these areas in comparison to the adopted Housing Element. However, the only methods to completely avoid impacts to scenic vistas would be to severely limit the development potential on the City's sites that accommodate residential uses, including the Inventory Sites and Opportunity Sites (including Site 14 and Site 52 in the event of a RHNA shortfall), as well as additional accessory dwelling units and junior accessory dwelling units on sites with existing residential uses or that are designated to allow residential uses.

Methods to reduce impacts to scenic vistas include reducing building heights, limiting building mass, and reducing lot coverage and/or requiring development to not obstruct view corridors, which would have the effect of limiting density and the number of units that can be accommodated on sites, for the proposed overlays and the ODDS, which would also have the effect of reducing the density and capacity of sites anticipated to accommodate residential and mixed use development. These types of mitigation that could be considered for Alternative 5 as well as the Project are not consistent with the objectives of the proposed Amended Housing Element to encourage and facilitate residential development, to affirmatively further fair housing opportunities, and to accommodate the City's housing needs, including identifying adequate sites to accommodate the Regional Housing Needs Assessment (RHNA) allocation in order to comply with Government Code Section 65863. Visual impacts under Alternative 5 would worsen views of scenic resources in the vicinity of Site 14 and 52, while improving views near Site 84 due to reduced building height and mass. Therefore, the impact of Alternative 5 on scenic vistas would be similar to those impacts under the Project, but could have an impact on more scenic views than under the Project. As such, this impact would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-2	**Implementation of Alternative 5 would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a State scenic highway. (See Impact 3.1-2 for Project impacts related to this topic)**

There are no designated State Scenic Highways in the Planning Area. Highway 101 is eligible for designation as a State Scenic Highway from its intersection with State Route 1 in the north to the Marin County Line in the south. The portion of Highway 101 that is eligible for designation and traverses the Planning Area, begins at the Rodeo Avenue exit in the north and extends to the Robin Williams Tunnel (previously called the Waldo Tunnel) in the south. Along this route, undeveloped hills with grassland, shrubs, trees, and rock outcroppings can be seen in the immediate vicinity and Richardson Bay, Mount Tamalpais, Strawberry Point, Tiburon, Belvedere, Angel Island, Alcatraz, the East Bay, and the San Francisco-Oakland Bay Bridge can be seen in the distance. Further, South Ridge, Wolfback Ridge, and Cypress Ridge are all visible from Highway 101.

The Robin Williams Tunnel was evaluated in the Caltrans Statewide Historic Bridge Inventory Update in January 2006.[3] Built in 1937 and 1954, the two tunnels are considered a single property in the report. As detailed in the report, the property meets National Register Criterion A for its association with the development of the Bay Area transportation network,

[3] California Department of Transportation (Caltrans). 2006. Caltrans Statewide Historic Bridge Inventory Update: Tunnels. Website:https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/f0008649-tunnels-2006-a11y.pdf. Accessed: November 7, 2023.

and Criterion C, as a significant achievement in civil engineering and construction.[4] There is no proposed development within Highway 101; however, development under the Amended Housing Element, such as Opportunity Sites 101, 73, 84, 86, and 87, Inventory Sites, as well as additional accessory dwelling units and junior accessory dwelling units on sites with existing residential uses or that are designated to allow residential uses, could be visible from Highway 101. Under Alternative 5, a reduction of units on Site 84 could result in lower building heights and a reduction in building mass, potentially lessening visual impacts as compared to the Project.

Site 14 at 300 Spencer Street is nearly adjacent to Highway 101 and along a ridgeline. Development on this site would be visible from Highway 101, particularly to northbound traffic. Although development on Site 14 would realistically be capped at 32 feet, approximately 3 stories, it would be taller than the existing fire station structure which is two stories plus an extended roof. The potential to increase the building height on this site could obstruct views from public vantage points including from Highway 101, and the intersection of Spencer Avenue and Monte Mar Drive. The introduction of Site 52 is not anticipated to have an effect on scenic resources within a State scenic highway, although this portion of Highway 101 is eligible.

The proposed overlays would allow increased building heights, mass, and lot coverage compared to the current building heights permitted by the existing zoning ordinance. Maximum building heights would range from 32 feet to 45 feet. The previous maximum building height was three stories, and most existing buildings in the City are three stories or less. The potential to increase building heights could obstruct views from public vantage points, such as Dunphy Park and Bridgeway. As such, implementation of both the Project and Alternative 5 could result in impact to views of scenic resources, such as trees, rock outcroppings, or historic buildings within an eligible State Scenic Highway.

As discussed under Impact 4.5-1, projects proposed on Opportunity Sites and other projects eligible to be processed pursuant to the ODDS would not go through the City's current design review process and would go through a separate review process that considers the project's design and features as identified by the ODDS. This process accommodates higher densities than currently envisioned by the General Plan, including the Land Use Element, and the Zoning Ordinance and projects may result in obstruction of views and conflicts with the natural resources on the site in order to accommodate the densities allowed under the Opportunity Site overlay districts and the ODDS, as described in Chapter 2. For projects eligible to be processed pursuant to Municipal Code Title 10A (ODDS), these residential and mixed use development would be subject to the sections of the Sausalito Municipal Code that protect scenic resources, thereby minimizing potential impacts to existing views that

[4] California Department of Transportation (Caltrans). 2006. Caltrans Statewide Historic Bridge Inventory Update: Tunnels. Website:https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/f0008649-tunnels-2006-a11y.pdf. Accessed: November 7, 2023.

can be seen from Highway 101, an eligible State Highway. For example, as the City receives development applications for subsequent development under the Project and Alternative 5, those applications will be reviewed by the City of Sausalito for compliance with the City's Municipal Code Chapter 11.12 (Preservation of Trees and Views), which protects certain species and sizes of trees, in addition to dedicated trees of special significance to the city, on private property, and all trees and shrubs on city property. The Sausalito Municipal Code safeguards these trees against removal, alteration, and damage, without first having obtained a tree removal or alteration permit from the city. Nevertheless, as noted previously, both the Project and Alternative 5 would directly conflict with Policy CD-1.3 as a result of the recommended increases in building heights to four stories in select overlay zones and would allow eligible projects to be processed through the ODDS, which would remove such projects from the City's current design review process.

In conclusion, development envisioned by both the Project and Alternative 5 proposes development adjacent to an eligible Scenic Highway, such as Opportunity Sites 101, 73, 84, 86, 87, and 14, several Inventory Sites, or other existing sites throughout the City, which could be visible from Highway 101; as such, implementation of both the Project and Alternative 5 may result in an impact to trees, rock outcroppings, or historic buildings within an eligible State Scenic Highway. The addition of Site 14 near an eligible stretch of Highway 101 would introduce one additional site beyond the Project that could affect views. As such, a ***potentially significant*** impact would occur under both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
None Feasible

Level of Significance after Mitigation
Significant and Unavoidable

The only mitigation methods to completely avoid impacts to scenic resources would be to severely limit the residential development potential of the City, including on the Inventory Sites and Opportunity Sites and/or to reduce building heights, massing, and lot coverage and to limit development visible from Highway 101 for residential and mixed use sites, as well as additional accessory dwelling units and junior accessory dwelling units on sites with existing residential uses or that are designated to allow residential uses. These types of mitigation that could be considered for the Project and Alternative 5 are not consistent with the objective of the proposed Amended Housing Element to encourage and facilitate residential development, to affirmatively further fair housing opportunities, and to accommodate the City's housing needs, including identifying adequate sites to accommodate the RHNA allocation in order to comply with Government Code Section 65863. Under Alternative 5, the addition of Site 14 near an eligible stretch of Highway 101 would introduce one additional

site beyond the Project that could affect views, making the impact on scenic resources within an eligible State Highway slightly worse than under the Project. As such, this impact would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-3	**Implementation of Alternative 5 would substantially degrade the existing visual character or quality of public views in non-urbanized areas. (Public views are those that are experienced from publicly accessible vantage points). (See Impact 3.1-3 for Project impacts related to this topic)**

The only large non-urbanized sections of the Planning Area are the portions of GGNRA that, while located within city limits, west of Highway 101, are under federal jurisdiction, as well as portions of Richardson Bay. Because the GGNRA is federal parkland, the City does not have land use authority over it, and implementation of both the Project and Alternative 5 would not anticipate or facilitate any changes to the federal parkland. Additionally, no federal projects are currently proposed or anticipated to be constructed on the federal parkland under the Project or Alternative 5. Further, the GGNRA is at elevation above the city. In the vicinity of the Planning Area, the GGNA ranges in elevation from 419 feet to 1,112 feet. The Sausalito Planning Area ranges in elevation from 1 foot to 812 feet. Views from portions of the GGNRA to Richardson Bay, Strawberry Point, Tiburon, Belvedere, Angel Island, Alcatraz, the East Bay, and points beyond may be obstructed by implementation of the Project and Alternative 5. From the higher points of the GGNRA near Highway 101, views of the Sausalito waterfront are visible. Views of the City and Richardson Bay may also be obstructed by implementation of the Project and Alternative 5. Densification of underdeveloped or undeveloped areas with taller buildings could affect these views of the City and the hillside views behind the urban areas of the City.

As described under Impacts 4.5-1 and 4.5-2, future development envisioned by the Project and Alternative 5 would result in an increase in new residential and mixed use development that could alter scenic resources and natural features within the urbanized portions of the Planning Area, thereby incrementally altering the quality of public views from publicly accessible vantage points within the urbanized portions of the city. However, development would be limited to vacant and/or underutilized existing parcels as shown in Figure 4-6, and would be comprised of infill development that would occur within the fabric of already developed areas throughout the city. It is noted, however, that depending on the ultimate massing, placement, and building height, it is possible that development of residential and mixed use sites, such as Opportunity Site 101 or Opportunity Site 14, could potentially obstruct views of and from the GGNRA. Under Alternative 5, Site 14 would be redeveloped from a two-story fire station to a two- to three-story residential structure, slightly worsening views from the east toward the ridgelines as compared to the Project. However, the reduction of building height and mass on Site 84 under Alternative 5 would improve the visual character or quality of public views as compared to the Project. Additionally, projects proposed on Opportunity Sites and other projects eligible to be processed pursuant to the

ODDS would not go through the City's current design review process and would go through a separate review process that considers the project's design and features as identified by the ODDS. This process accommodates higher densities than currently envisioned by the General Plan, including the Land Use Element, and the Zoning Ordinance and projects may result in obstruction of views and conflicts with the natural resources on the site in order to accommodate the densities allowed under the Opportunity Site overlay districts and the ODDS, as described in Chapter 2. This process would ensure that future development projects within the urbanized areas are cohesive, appropriately designed in terms of potential aesthetic impacts, and reflect the character of the city. Nevertheless, as noted previously, the increased densities allowed under both the Project and Alternative 5 would allow building heights and building massing that could obstruct views from non-urbanized areas. Therefore, impacts to the quality of public views in both urban and non-urbanized areas would be ***potentially significant*** under both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
None Feasible

Level of Significance after Mitigation
Significant and Unavoidable

The only methods to completely avoid impacts to the existing visual character or quality of public views in non-urbanized areas would be to severely limit the development potential on the Opportunity Sites and/or reduce building heights, building massing, and lot coverage for the proposed overlays and ODDS. These types of mitigation that could be considered for Alternative 5 as well as the Project are not consistent with the objective of the proposed Amended Housing Element to encourage and facilitate residential development, to affirmatively further fair housing opportunities, and to accommodate the City's housing needs, including identifying adequate sites to accommodate the RHNA allocation in order to comply with Government Code Section 65863. Although there would be some differences in views between Alternative 5, notably with a taller structure on Site 14 and reduced building massing and height on Site 84, as compared to the Project, the overall impact on visual quality and character of public views in non-urbanized areas would be similar between the Project and Alternative 5. As such, this impact would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-4 Implementation of Alternative 5 would substantially conflict with applicable zoning and other regulations governing scenic quality in urbanized areas. (See Impact 3.1-4 for Project impacts related to this topic)

The city is located in an urbanized area and development accommodated by both the Project and Alternative 5 would result in additional residential development throughout the city and along the waterfront areas and would be limited to vacant and/or underutilized existing parcels as shown in Figure 4-6. The potential growth in residential and mixed uses would be infill development and would occur within the urbanized portions of the city. New development projects under both the Project and Alternative 5 would be required to improve public access to the shoreline and views (Program W-4.3.3). Any future development that is proposed within the city will need to demonstrate consistency with the General Plan during the design review process.

As discussed under Impact 4.5-1, as the City receives development applications for subsequent development of the Inventory Sites and Opportunity Sites under Programs 4 and 19 of the Housing Element, those applications will be reviewed by the City of Sausalito for compliance with the policies and programs of the General Plan related to scenic quality in urbanized areas, including view corridors, scenic resources, and natural features. In addition, the City's Municipal Code, which implements the City's General Plan would be reviewed at the time that development applications are received. However, it is noted that implementation of the Project and Alternative 5 would result in changes to the General Plan that reduce the application of design review, as well as remove the three-story maximum building height requirement for the overlay districts and ODDS. Under the Project and Alternative 5, projects that are processed under the ODDS would be reviewed for consistency with the future Title 10A (rather than Title 10, Zoning Ordinance). While new standards would be created through the ODDS and the General Plan and Zoning Ordinance would be amended, these changes would not be consistent with the existing regulations that address visual character and scenic resources; thus, the future development in the Planning Area allowed under both the Project and Alternative 5 will likely result in development that changes the visual character of Sausalito. Under Alternative 5, these changes could also affect the scenic quality of views of and from the vicinity of Sites 14 and 52 because buildings constructed on those sites could be taller than the sites' existing structures.

In conclusion, residential and mixed use development envisioned by the Project and Alternative 5 could result in an increase in the intensity of new residential and non-residential development that could potentially conflict with applicable zoning and other regulations governing scenic quality and visual character in the urbanized portion of the Planning Area. Therefore, this impact would be ***potentially significant*** under both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
None Feasible

Level of Significance after Mitigation
Significant and Unavoidable

The only methods to completely avoid impacts from Alternative 5, or from the Project, to the scenic quality would be to severely limit the development potential of residential and mixed use projects, including on the Inventory Sites and Opportunity Sites, and/or reduce building heights, building mass, and lot coverage for the proposed overlays. These types of mitigation that could be considered for Alternative 5 and the Project are not consistent with the objective of the proposed Amended Housing Element to encourage and facilitate residential development, to affirmatively further fair housing opportunities, and to accommodate the City's housing needs, including identifying adequate sites accommodate the RHNA allocation in order to comply with Government Code Section 65863. The Project and Alternative 5 would both conflict with applicable zoning and other regulations governing scenic quality, and impacts would be similar. As such, this impact would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-5 Implementation of Alternative 5 would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (See Impact 3.1-5 for Project impacts related to this topic)

Nighttime illumination and glare impacts are effects of a project's exterior lighting upon adjoining uses and areas. Light and glare impacts are determined through a comparison of existing light sources with proposed lighting plans or policies. Urban land uses on the city's waterfront are the main source of daytime and nighttime light and glare. The hillsides are characterized by less intense development and generally have lower levels of ambient nighttime lighting and daytime glare. Existing lighting is located on the interior and exterior of the structures in the Planning Area, which are one to three stories tall.

Development of the residential and mixed use development, including Inventory Sites and Opportunity Sites under both the Project and Alternative 5 would result in additional residential development throughout the city and along the waterfront areas, including the vacant and/or underutilized existing parcels as shown in Figure 4-6. The potential growth in residential uses would be infill development and would occur within the urbanized portions of the city; however, the new development would create new sources of light and glare within the Planning Area, contributing to increased ambient nighttime lighting conditions with potential effects to nighttime waterfront views. Specific sources of lighting would include exterior light fixtures, interior lighting, and headlights from motor vehicles. Specific sources of glare would include reflective building and motor vehicle surfaces, including windows. These new sources of light and glare would be located throughout the Planning Area, including at Inventory Sites and Opportunity Sites on the City's hillsides, along Bridgeway,

and along the waterfront. Nighttime lighting would be increased on Site 14 under Alternative 5 as the existing onsite fire station is no longer in use, and only has minimum security lighting present. This illumination of Site 14 would be greater under Alternative 5 than under the Project. Under Alternative 5, nighttime lighting on Site 52 would change from surface parking lot and building illumination to illumination of residential and/or mixed uses, although the intensity of lighting on the site is not anticipated to change significantly. Further, many of the Opportunity Sites, Inventory Sites, as well as sites eligible to be developed under the ODDS could be developed with buildings up to four stories tall, which is one story taller than all of the existing buildings in the Planning Area. These increased building heights would result in more building surfaces that could have exterior lighting, as well as increased interior building space which would contain interior lighting. Under Alternative 5, the intensity of development on Site 84 would be reduced as compared to the Project, as building height and mass would be reduced, as would the number of units present on the site, from 94 to 80. The potential for a further reduction to 50 units would further decrease new sources of light. Further, if no units are developed on Site 84, lighting levels could be maintained as they are now, with no change to the lighting emanating from Site 84. The General Plan includes policies and programs that encourage energy conservation and dark sky measures, which could result in a reduction in existing light and glare. For example, Program LU-4.5.2 would explore the process of retiring open water properties in order to maintain views and provide ecological value, in part, by reducing light and glare. Further, General Plan Policy EQ-2.3 encourages maintaining public open space in its natural state, compatible with the preservation of environmental resources, views, and surrounding area uses. Compliance with this policy would ensure current natural areas are not developed with light sources and would contribute to an overall reduction in light and glare. General Plan Program S-1.2.2 would replace city incandescent streetlights to Light Emitting Diode (LED) or other less energy intensive fixtures, which could result in less glare. These policies would be applicable to both the Project and Alternative 5.

As the City receives development applications for subsequent development under the Project and Alternative 5, those applications will be reviewed by the City of Sausalito for compliance with the City's Municipal Code, which includes standards for exterior lighting, as well as a review of potential glare impacts in the design review process. Projects for which signs are proposed would be reviewed for compliance with Section 10.42.060 of the Municipal Code, which includes standards for internal illumination, external illumination, and illumination control. Future projects under both the Project and Alternative 5 requesting parking lot lighting would be reviewed for compliance with Section 10.40.120 of the Municipal Code, which requires that parking lot lights are designed to illuminate the parking area and directed away from adjacent properties and any dwelling units. However, projects subject to the ODDS would be reviewed for consistency with Title 10A that will be created for the ODDS, rather than being required to be consistent with these Title 10 requirements.

In conclusion, residential development envisioned by both the Project and Alternative 5 could result in an incremental increase in new residential development that could potentially increase daytime glare and nighttime lighting within the Planning Area, resulting in increased ambient nighttime lighting conditions with potential effects to nighttime views, including waterfront, hillside, ridgeline, and open space views. While compliance with the applicable development and design standards in the Sausalito Municipal Code, including Section 10.42.060 (Sign and Awning Standards), Section 10.40.120 (Design and Improvement of Parking), Section 10.26.040 (Site Development Requirements), and the ODDS would alleviate some light and glare impacts, these requirements would not be applied to all projects, and this impact would be ***potentially significant*** under both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-5 Implement Mitigation Measures 3.1-5a) and 3.1-5b as described for the Project.

MM 3.1-5a Avoid Effects of Project Lighting During Operation. Future residential projects and mixed use projects with a residential component shall implement the following design measures in order to reduce potential light and glare impacts:

- To minimize spillover lighting and glare impacts, all lighting from the project, including parking lot lighting and exterior building lighting, shall be LED, have full-cutoff luminaires (meaning no light is emitted above the horizontal plane of the fixture), and shall be aimed specifically to only illuminate areas within the project site or adjacent public right-of-way.
- All structures shall incorporate nonreflective exterior building materials in their designs, and the use of reflective glass shall be prohibited.

MM 3.1-5b Avoid Effects of Project Lighting During Construction. Prior to the start of construction, future applicants shall prepare a Construction Lighting and Screening Plan. The Construction Lighting and Screening Plan should indicate aesthetic and lighting treatments for all construction work areas (i.e., maximum brightness values not to be exceeded by artificial bulbs, screening around project site to limit light and glare, use of non-reflective glass, etc.). The Plan shall identify methods used to ensure construction lighting is directional (aimed toward work areas, and not toward nearby sensitive receptors), and limited to sufficient wattage for safety and security. Construction areas visible to sensitive receptors shall be screened via curtains from public view. Construction screening materials shall be of

sufficient height and appropriate color to minimize viewshed impacts, as determined appropriate by the applicable jurisdiction(s).

Level of Significance after Mitigation
Significant and Unavoidable

Mitigation Measure 4.5-5 would alleviate light and glare impacts during construction and operation of future residential and mixed use development. This mitigation would apply to both the Project and Alternative 5.

The only methods to completely avoid impacts related to light and glare would be to severely limit the development potential of both the Project and Alternative 5 through decreasing densities or removing sites from residential and mixed use designations in order to limit these uses as new sources of light and glare. These types of mitigation that could be considered for Alternative 5, and the Project, are not consistent with the objective of the proposed Amended Housing Element to accommodate the RHNA allocation in order to comply with Government Code Section 65863. Although lighting impacts at Site 14 would be slightly worse under Alternative 5 as compared to the Project, lighting impacts would be lessened at Site 84. Impacts on Site 52 would be similar under Alternative 5 as under the Project. As such, lighting and glare impacts under Alternative 5 would be similar to those under the Project, and this impact would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-6:	**Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to aesthetics. (See Impact 3.1-6 for cumulative plus Project impacts related to this topic)**

The geographic context for analysis of cumulative impacts related to aesthetics includes the unincorporated lands surrounding the Planning Area, including Marin City. In general, potential visual impacts take in the immediate surroundings in an urbanized area; thus, the analysis of cumulative aesthetic impacts focuses on areas that share a viewshed with the City's Planning Area. This analysis evaluates whether impacts of Alternative 5, together with impacts of cumulative development, would result in a cumulatively significant impact with respect to aesthetics. This analysis then considers whether incremental contribution of the impacts associated with implementation of Alternative 5 would be considerable. Both conditions must apply for cumulative effects to rise to the level of significance.

Existing vistas and visual resources in the Planning Area include natural terrain, ridgelines, and Marinship view corridors with views of the waterfront and bay. Existing vistas and visual resources in the unincorporated lands surrounding the Planning Area and region include a variety of landscape settings, such as pastoral and rural areas, beaches and coastal bluffs,

and the Pacific Ocean, especially from and along trails, particularly near the coast.[5] Existing sources of nighttime light include those common to developed areas or areas through which traffic travels regularly (e.g., street lights, parking lot lighting, building lighting, illuminated signs, vehicle headlamps, interior building lighting visible through windows). Existing sources of glare include reflection of sunlight and artificial light off windows, buildings, and other surfaces in the day, and glare from inadequately shielded or improperly directed light sources at night. Nighttime light sources in areas with less intense development and lower population density, such as rural areas in the west and inner-rural areas of the county, are typically sparser than in more developed or more highly populated areas, such as urban areas in the east, especially along the Highway 101 corridor. Therefore, sources of nighttime light in the county would generally be expected to diminish from east to west.[6]

Implementation of Alternative 5 would contribute to the urbanization of the City and result in the construction of new structures that could impede views. However, development of future housing and mixed use projects subject to the ODDS would be reviewed for consistency with Title 10A that will be created for the ODDS. Compliance with the requirements within the General Plan and Zoning Code would reduce visual impacts and light and glare impacts to the greatest extent feasible.

Additionally, potential cumulative aesthetic impacts to eligible scenic highways would be reduced to below a level of significance through participation in the State Scenic Highway program and local ordinances and policies. Similarly, cumulative projects within unincorporated Marin County would be required to comply with applicable Marin Countywide Plan policies and programs and adhere to development and design standards in the Marin County Municipal Code that address aesthetics, including lighting and glare, the alteration of scenic resources and natural features, the alteration of views of scenic resources and natural features, and the alteration of views of the open waters of the Bay and land masses beyond the open waters, as seen from public or special vantage points.

Nevertheless, as cumulative development in the Bay Area increases over time, impacts related to aesthetics would incrementally increase. For these reasons, cumulative impacts to aesthetics, State Scenic Highways, or nighttime lighting and daytime glare would be ***less than significant*** under Alternative 5, as it would be under the Project.

[5] County of Marin, 2022. Housing & Safety Element Update to the Marin Countywide Plan Draft Environmental Impact Report. October. Available: https://www.marincounty.org/-/media/files/departments/cd/planning/environmental-impact/housing-and-safety-elements-eir-docs/marin-hese-public-draft-eir-oct-2022.pdf?la=en. Accessed November 7, 2023. Page 4-3.

[6] County of Marin, 2022. Housing & Safety Element Update to the Marin Countywide Plan Draft Environmental Impact Report. October. Available: https://www.marincounty.org/-/media/files/departments/cd/planning/environmental-impact/housing-and-safety-elements-eir-docs/marin-hese-public-draft-eir-oct-2022.pdf?la=en. Accessed November 7, 2023. Page 4-4.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Air Quality

Information regarding the existing setting, regulatory setting, and thresholds of significance for Air Quality impacts can be found on pages 3.2-1 through 3.2-19 in Section 3.2, Air Quality, of the Draft EIR.

Impact 4.5-7 Implementation of Alternative 5 would not conflict with or obstruct implementation of the applicable air quality plan. (See Impact 3.2-1 for Project impacts related to this topic)

The current AQMP applicable to the Planning Area is the 2017 Bay Area Clean Air Plan. Under BAAQMD's guidance, a proposed long-range plan is consistent with the AQMP if it would (1) support the primary goals of the AQMP, (2) include applicable control measures from the AQMP, and (3) not disrupt or hinder implementation of any AQMP control measures. In addition, (4) the plan's projected VMT increase must be less than or equal to its projected population increase. Based on the analysis below, both Alternative 5 and the Project would be consistent with the AQMP prepared by the BAAQMD.

(1) Development of Sites Identified in both the Project and Alternative 5 Support the Primary Goals of the AQMP

The primary goals of the 2017 Bay Area Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate.

Attain Air Quality Standards

BAAQMD's 2017 Bay Area Clean Air Plan strategy is based on regional demographic projections within the Bay Area compiled by ABAG.[7] Demographic trends incorporated into the Plan Bay Area determine vehicle miles traveled (VMT) within the Bay Area, which BAAQMD utilizes to forecast future air quality trends. The SFBAAB is currently designated a nonattainment area for O_3, $PM_{2.5}$, and PM_{10} (State AAQS only).

Implementation of Alternative 5 is consistent with the 2017 Bay Area Clean Air Plan's strategy for three independent reasons. First, the limited growth projected by implementation of Alternative 5 is consistent with the growth assumptions used in the AQMP. Specifically, the projections associated with the 2017 Bay Area Clean Air Plan estimated an increase of approximately 820,000 households from 2010 to 2040. As stated by ABAG, only 13 percent of this growth occurred between 2010 and 2015, as household formation was held back in part by post-recession financial conditions and a lack of housing production.[8] Alternative 5 would only result in a maximum increase of 1,133 new units during the planning period, a

[7] Projections 2040 by Jurisdiction (Curated), prepared by ABAG. Website: http://projections.planbayarea.org/. Accessed August 1, 2024.

[8] Plan Bay Area 2040 Final Plan. 2019. Website: http://2040.planbayarea.org/forecasting-the-future#:~:text=ABAG%20and%20MTC%20forecast%20that,added%20between%202010%20and%202015.

miniscule proportion of the 820,000 households projected for the region between 2010 and 2040 by ABAG. The Project would result in up to 1,147 units being developed, also a miniscule proportion of projected regional growth.

Second, the Project will reduce VMT per capita compared with existing conditions. Specifically, as described in Section 3.14: Transportation and Circulation of this Draft EIR, the residential VMT per capita in the City of Sausalito is projected to be 13.2 miles with implementation of the Project, which is a reduction from existing levels. Under Alternative 5, units at Sites 14 and 52 are projected to produce somewhat lower VMT per capita than units at Site 84. This means that shifting any number of units from Site 84 to Site 14 and/or Site 52 would reduce VMT levels as compared to the Project. If the number of units on Site 84 is reduced to zero and Sites 14 and 52 are each allocated 25 added units, modeling indicates that citywide home-based VMT is estimated to be reduced by about 1,130 miles as compared to the Project. This could be considered a slight reduction in VMT impacts compared to the Project, though when considered at the citywide level, the decrease would not result in a measurable change to Sausalito's VMT per Capita. With respect to the effects associated with increasing the proportion of affordable units on Sites 303 and 202, per-capita VMT levels at these sites would be expected to decrease slightly under Alternative 5 as compared to the Project given the relationship between affordable housing and lower levels of VMT production, as transit-rich areas are more likely to have denser housing. Data from the California Household Travel Survey shows that low-income households drive 25 to 30 percent less when living within a half mile of transit, and 50 percent less when living within a quarter mile of frequent transit, in comparison to households at the same income level living far from transit.[9,10] However, these changes are not anticipated to result in measurable changes to VMT per capita at the citywide level compared to the Project due to the spreadout nature of VMT throughout the city.

Third, the General Plan, and by extension implementation of programs within the General Plan, includes policies and programs to ensure consistency with the AQMP and meet air quality standards. Examples of such General Plan policies and programs a listed below:

- Program EQ-5.1.7: Odor-Emitting Uses. Continue to investigate the need for special conditions for potential odor-emitting uses through the environmental review process.
- Program EQ-5.2.1: Air Quality Outreach. Distribute to residents and businesses an air quality public information handout prepared by the Bay Area Air Quality Management

[9] Transform and California Housing Partnership Corporation. 2014. Why Creating and Preserving Affordable Homes Near Transit is a Highly Effective Climate Protection Strategy. Available: https://chpc.net/wp-content/uploads/2015/11/4-AffordableTODResearchUpdate070114.pdf. Accessed: December 11, 2024.

[10] California Air Pollution Control Officers Association (CAPCOA), 2021. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers. Public Draft. August.

District (BAAQMD) identifying common hazardous materials and materials whose emissions are regulated.

- Program EQ-5.2.3: Toxic Chemicals. Initiate public awareness programs to minimize the use of toxic garden and lawn sprays for both public and private purposes (see Policy HS-1.4).
- Program EQ-5.2.4: Dust Mitigation. Require that developers prepare a dust mitigation plan identifying strategies for reducing particulate emissions.
- Program EQ-5.2.5: Electrify Equipment: Require city usage and promote resident usage of electric landscape equipment where possible, for example replacing gasoline-powered leaf blowers with electric blowers.
- Program EQ-5.2.6: Reduced-Emission Equipment. Give preference to contractors and contracts for services to firms that use reduced-emission equipment and/or practice sustainable operations.
- Policy S-1.2 Energy-Efficiency, Residential, and Commercial. Improve energy efficiency of all buildings, services, and infrastructure.
- Policy S-1.3 Renewable Energy, Residential, and Commercial. Encourage renewable energy generation and installations and/or purchasing MCE 100 percent renewable Deep Green service level in residential and commercial buildings.
- Program HS-1.4.1 Marin County Hazardous and Solid Waste Management JPA. Work with Marin County, other cities in Marin County and other jurisdictions as necessary on implementation measures described by the Marin County Hazardous and Solid Waste Management - JPA.
- Program HS-1.4.3 Use of Potentially Harmful Materials on Public Lands. Only allow qualified professionals to use potentially harmful materials on public land. Otherwise, eliminate the use of potentially harmful materials on public land and minimize uses throughout the city. Continue to enforce the personnel regulation that requires the use of potentially harmful materials on public lands be done by qualified professionals only.
- Program HS-1.4.6 Hazardous Materials Business Plan. Continue to require that all businesses that store more than 55 gallons of hazardous materials on site file a Hazardous Materials Business Plan with the County Office of Waste Management.

Accordingly, impacts resulting from both the Project and Alternative 5 would be ***less than significant.***

Reduce Population Exposure and Protect Public Health from Toxic Air Contaminants
Development anticipated by both the Project and Alternative 5 could result in an incremental increase in new residential and nonresidential uses. As identified in the discussion of

community risk and hazards (see Impact 4.5-8 below), new sensitive land uses could be proximate to sources of TACs, and new nonresidential land uses could generate an increase in TACs, under both the Project and Alternative 5. However, as discussed in Impact 4.5-8, mandatory compliance with BAAQMD regulations would ensure that new sources of TACs do not expose populations to significant health risk. Therefore, the Project and Alternative 5 would be consistent with the AQMP and impacts would be ***less than significant***.

Reduce Greenhouse Gas Emissions

Background regulatory information for GHG emissions is discussed in Section 3.7, Greenhouse Gas Emissions. Impacts from Alternative 5 on GHG emissions are discussed in Impacts 4.5-28 and 4.5-29, below. As discussed in Impacts 4.5-28 and 4.5-29, implementation of Alternative 5 and the Project is expected to achieve the 2030 Statewide GHG reduction goal and is forecasted to advance toward the 2050 statewide goal. Accordingly, impacts for the Project and Alternative 5 would be ***less than significant***.

(2) Both the Project and Alternative 5 Include Applicable Control Measures From the AQMP

The 2017 Bay Area Clean Air Plan contains 55 control measures aimed at reducing air pollution in the Bay Area. These include control measures addressing emissions from stationary sources, transportation, buildings, energy, agriculture, natural and working lands, waste, water, and super-GHG pollutants. Specific examples of the control measures include: trip reduction programs, transit efficiency and use, safe routes to schools and transit, parking policies, urban heat island mitigation, decrease electricity demand, green buildings, urban tree planting, and green waste diversion. Only some of the control measures from the AQMP would be applicable to Alternative 5 or the Project. Both the Project and Alternative 5 would be required to implement all applicable control measures from the AQMP. For example, the Project as well as Alternative 5 would develop buildings that are considerably "greener" (i.e., more environmentally friendly) than the existing building stock, and would decrease electricity demand greatly compared with the existing building stock, based on their compliance with the latest version of the CalGreen Code and the 2022 California Building Standards Code. Therefore, impacts would be ***less than significant*** for both the Project and Alternative 5.

(3) Neither The Project Nor Alternative 5 Would Disrupt or Hinder Implementation of any AQMP Control Measures

Implementation of either the Project or Alternative 5 would require incorporation and consistency with the control measures included in the 2017 Bay Area Clean Air Plan. As stated in the 2017 Bay Area Clean Air Plan, the BAAQMD is responsible for implementing these control measures; implementation of such control measures is required by law. Neither the Project nor Alternative 5 include any components that would disrupt or hinder implementation of any control measures, such as precluding an extension of a planned transit line or bike bath or proposing excessive parking. Overall, Alternative 5 and the Project

also do not include stationary sources and so would not impact any of the stationary sources control measures; would not impact any of the transportation, agriculture, natural and working lands control measures (since both the Project and Alternative 5 are a housing project and not a transportation, agriculture, or natural and working lands project); and would be consistent with the applicable buildings, energy, waste, water, and Super-GHG control measures, as required by law. As such, both the Project and Alternative 5 would not hinder BAAQMD from implementing the control measures in the 2017 Bay Area Clean Air Plan. Therefore, impacts due to inconsistency under this criterion would be ***less than significant*** for both the Project and Alternative 5.

(4) The Project and Alternative 5 Would Reduce VMT Per Capita

The VMT created from implementation of the Project has been analyzed in Section 3.14, Transportation, and further discussed in Impact 4.5-52, which found that with implementation of the Project, the residential VMT per capita in the City of Sausalito is projected to be 13.2 miles, which is a reduction from existing levels of 15.1 miles per capita. As such the Project is not anticipated to result in an increase in VMT per service population. Similarly, nonresidential VMT would be 23.5 miles with implementation of the Project, compared to 25.9 miles under existing conditions.

Under Alternative 5, units at Sites 14 and 52 are projected to produce somewhat lower VMT per capita than units at Site 84. This means that shifting any number of units from Site 84 to Site 14 and/or Site 52 would reduce VMT levels as compared to the Project. If the number of units on Site 84 is reduced to zero and Sites 14 and 52 are each allocated 25 added units, citywide home-based VMT is estimated to be reduced by about 1,130 miles as compared to the Project. This could be considered a slight reduction in VMT impacts compared to the Project, though when considered at the citywide level, the decrease would not result in a measurable change to Sausalito's VMT per Capita. With respect to the effects associated with increasing the proportion of affordable units on Sites 303 and 202, per-capita VMT levels at these sites would be expected to decrease slightly under Alternative 5 as compared to the Project given the relationship between affordable housing and lower levels of VMT production. However, these changes are not anticipated to result in measurable changes to VMT per capita at the citywide level compared to the Project. Therefore, impacts due to an increase in VMT would be ***less than significant*** for both the Project and Alternative 5.

Conclusion

In conclusion, development envisioned by both the Project and Alternative 5 would be consistent with the 2017 Bay Area Clean Air Plan, since it supports the primary goals of the AQMP, is consistent with the applicable control measures from the AQMP, does not disrupt or hinder implementation of any AQMP control measures, and neither the Project nor Alternative 5 would not increase VMT more than projected increase in population. Additionally, as described in further detail in Impacts 4.5-28 and 4.5-29, implementation of both the Project and Alternative 5 would have a less-than-significant impact relative to

greenhouse gases. Compliance with applicable air quality plans would be similar under the Project and Alternative 5. Therefore, the impact is ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-8	**Implementation of Alternative 5 would not 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. (See Impact 3.2-2 for Project impacts related to this topic)**

To comply with this threshold, the BAAQMD CEQA Guidelines provide that land use plans should incorporate policies and requirements that ensure they do not inhibit attainment of air quality standards and that actually assist in improving local and regional air quality.

In particular, BAAQMD evaluates criteria pollutants by evaluating consistency with the AQMP, as well as a comparison of project VMT to projected population increase. As described in detail within Impact 4.5-6 above, the development envisioned by both the Project and Alternative 5 would be consistent with the 2017 Bay Area Clean Air Plan, since it supports the primary goals of the AQMP, includes applicable control measures from the AQMP, does not disrupt or hinder implementation of any AQMP control measures, and neither the Project nor Alternative 5 would not result in an increase in VMT that is more than projected increase in population.

To reduce potential emissions impacts, BAAQMD further recommends that projects are evaluated in comparison to the air quality criteria pollutant thresholds of significance provided in the BAAQMD 2022 CEQA Guidelines. The BAAQMD 2022 CEQA Guidelines provides air quality criteria pollutant thresholds of significance for both operational and construction-related emissions.

Operational Buildout Emissions
The total net increase of residential and nonresidential land uses that could be developed with implementation of the Project and Alternative 5 was entered into the CalEEMod model and the calculated operational criteria air pollutants, in comparison to the applicable BAAQMD air quality criteria pollutant thresholds of significance, as shown in **Table 4-7**, below.

TABLE 4-7: OPERATIONAL CRITERIA AIR POLLUTANT EMISSIONS GENERATED BY THE PROJECT AND ALTERNATIVE 5

CATEGORY	CRITERIA AIR POLLUTANTS (POUNDS/DAY)							
	PROPOSED PROJECT				ALTERNATIVE 5			
	ROG	NO_X	PM_{10}	$PM_{2.5}$	ROG	NO_X	PM_{10}	$PM_{2.5}$
MOBILE	24.5	18.7	58.7	15.1	24.2	18.5	58.0	14.69
AREA	20.6	0.30	0.01	0.01	20.3	0.30	0.01	0.01
ENERGY	0.44	7.52	0.61	0.61	0.43	7.43	0.60	0.60
TOTAL	45.5	26.5	59.4	15.7	45.0	26.2	58.7	15.5
Pounds Per Day Thresholds	54	54	82	54	54	54	82	54
Exceeds Pounds Per Day Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
TONS PER YEAR	8.30	4.84	10.8	2.87	8.20	4.78	10.7	2.83
Tons Per Year Thresholds	10	10	15	10	10	10	15	10
Exceeds Tons per Year Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Source: CALEEMOD v 2022.1 (see Appendix B and Appendix B1).

As shown in Table 4-7, full buildout of either the Project or Alternative 5 would not exceed the BAAQMD air quality criteria pollutant thresholds of significance for operations, either in terms of pounds per day or in tons per year. Development under Alternative 5 would have fewer mobile emissions than the Project, and emissions from area and energy sources would be equal to or less than those under the Project.

Under both the Project and Alternative 5, all new development within the City would be required to meet the BAAQMD rules and regulations, including Regulation 6-3-306, which restricts the installation of wood burning fireplaces into new buildings and Regulation 8-3-301, which limits the allowed VOC levels in the architectural coatings applied onto buildings within the City. The 2022 California Code of Regulations, Title 24, Part 6 standards also requires that all homes built in California have zero-net-energy use, which is achieved through energy-efficiency measures, as well required rooftop solar photovoltaic systems. The 2022 California Code of Regulations, Title 24, Part 6 standards also apply to

nonresidential buildings and require a variety of energy efficiency measures to be implemented that will reduce energy as usage as well as air emissions.

As detailed above, neither the Project nor Alternative 5 would exceed the applicable BAAQMD thresholds of significance for operational criteria air pollutants, and operational air quality impacts would be less than significant. Moreover, development contemplated in the Project and Alternative 5 would comply with the applicable policies and programs in the City's General Plan, the City's Municipal Code, as well applicable State and BAAQMD rules and regulations. Further, all development applications are reviewed by the City under the design review procedures in the Municipal Code and per the Objective Design and Development Standards (ODDS). All development would be subject to development and design standards specified in the Municipal Code. Therefore, impacts would be similar under the Project and Alternative 5, and both would be ***less than significant***.

Construction Emissions

The total net increase of residential and commercial land uses that could be developed with implementation of Alternative 5 was entered into the CalEEMod model and the calculated construction criteria air pollutants, in comparison to the construction-related BAAQMD air quality criteria pollutant thresholds of significance, as shown in **Table 4-8**.

TABLE 4-8: CONSTRUCTION CRITERIA AIR POLLUTANT EMISSIONS GENERATED BY THE PROJECT AND ALTERNATIVE 5

CATEGORY	**CRITERIA AIR POLLUTANTS (POUNDS/DAY)**							
	Proposed Project				Alternative 5			
	ROG	**NO_X**	**Exhaust PM_{10}**	**Exhaust $PM_{2.5}$**	**ROG**	**NO_X**	**Exhaust PM_{10}**	**Exhaust $PM_{2.5}$**
TOTAL	47.6	14.3	0.57	0.53	47.0	14.3	0.57	0.53
Pounds Per Day Thresholds	54	54	82	54	54	54	82	54
Exceeds Pounds Per Day Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Source: CALEEMOD v 2022.1 (see Appendix B and Appendix B1).

As shown in Table 4-8, full buildout of the Project and Alternative 5 would not exceed the BAAQMD air quality criteria pollutant thresholds of significance for construction. Construction emissions under Alternative 5 would be less than or equal to those under the Project. Neither the Project nor Alternative 5 would exceed the applicable BAAQMD

thresholds of significance for construction-related criteria air pollutants, their impacts would be similar, and construction air quality impacts would be less than significant. Moreover, all development contemplated in both the Project and Alternative 5 would comply with the applicable policies and programs in the City's General Plan, the City's Municipal Code, as well applicable State and BAAQMD rules and regulations. As the City receives development applications, it will review those applications under the design review procedures in the Municipal Code and ODDS. All development would be subject to development and design standards specified in the Municipal Code. Construction-related impacts under Alternative 5 are similar to those under the Project. Therefore, impacts would be ***less than significant*** for both the Project and Alternative 5.

Conclusion

In conclusion, Alternative 5, similar to the Project, would not, directly or indirectly, generate emissions that would exceed the applicable BAAQMD air quality thresholds of significance, with Alternative 5 resulting in slightly less emissions and a slightly reduced impact in comparison to the Project. Therefore, neither the Project nor Alternative 5 would result in a cumulatively considerable net increase of any criteria pollutant and impacts for both the Project and Alternative 5 would be ***less than significant***.

Level of Significance before Mitigation

Less than Significant

Mitigation Measures

None Required

Level of Significance after Mitigation

Less than Significant

Impact 4.5-9 Development facilitated by Alternative 5 would not expose sensitive receptors to substantial pollutant concentrations. (See Impact 3.2-3 for Project impacts related to this topic)

The BAAQMD has identified local community risks from air pollutants to include exposure to TACs and $PM_{2.5}$ concentrations. TACs are a defined set of airborne pollutants that may pose a present or potential hazard to human health and $PM_{2.5}$ can cause a wide range of health effects (e.g., aggravating asthma and bronchitis, causing visits to the hospital for respiratory and cardiovascular systems, and contributing to heart attacks and deaths). Common stationary source types of TAC and $PM_{2.5}$ emissions include gasoline stations, dry cleaners, and diesel backup generators, which are subject to BAAQMD permit requirements. The other, often more significant, common source type is on-road motor vehicles on freeways and roads such as trucks and cars, and off-road sources such as construction equipment, ships, and trains.

Implementation of both the Project and Alternative 5 would have the potential of introducing new sources of TAC and $PM_{2.5}$ emissions within the City as well as siting new sensitive receptors, such as new homes in close proximity to existing sources of TAC and $PM_{2.5}$ emissions. The *Air Quality and Land Use Handbook: A Community Health Perspective*, adopted by the ARB in May 2005 was prepared to address the siting of sensitive land uses in close proximity to sources of TAC emissions that include the following sources within the City:

- Within 500 feet of Highway 101;
- Within 300 feet of dry cleaning operations that use perchloroethylene; and
- Within 50 feet of a typical gas station (currently no large gas stations exist in the city).

Under the Project, Opportunity Sites 101, 73, 84, 86, and 87 are within 500 feet of Highway 101. Under Alternative 5, the Opportunity Sites for the Project as well as Site 14 would be within 500 feet of Highway 101. Alternative 5 would place one additional site (Site 14) in close proximity to the highway as compared to the Project.

The City's existing General Plan includes policies and programs would minimize exposure to TAC and $PM_{2.5}$ concentrations within the City. These policies would apply to both the Project and Alternative 5. Specifically, Program EQ-5.2.1 requires the City to provide public information that identifies common hazardous materials and Program EQ-5.2.3 requires the City to initial public awareness to minimize the use of toxic garden and lawn sprays. Program HS-1.4.1 requires the City to work with Marin County and other jurisdictions to properly manage hazardous waste and Program HS-1.4.3 eliminates the use of harmful materials on public lands and minimizes their use throughout the City. Program HS-1.4.7 requires that all businesses that store more than 55 gallons of hazardous materials onsite to file a hazardous materials business plan with the County Office of Waste Management. In addition, all new sources of TAC emissions within the City would be required to obtain an Air Permit from BAAQMD that includes analysis of any TAC or $PM_{2.5}$ emissions created from the new source and the potential health impacts to the nearest sensitive receptor. The BAAQMD evaluates new sources of TAC emissions based on the following conditions:

- The extent to which the new source would increase risk levels, hazard index, and/or PM2.5 concentrations at nearby receptors,
- Whether the source would be permitted or non-permitted by the BAAQMD, and
- Whether the project would implement Best Available Control Technology for Toxics (T-BACT), as determined by BAAQMD.

Compliance with the applicable policies and programs in the General Plan, as well applicable BAAQMD rules and regulations, would minimize the potential exposure of new sensitive receptors to substantial concentrations of TACs and $PM_{2.5}$ within the City, as well as existing receptors to new sources of TACs and $PM_{2.5}$ that could be generated by the Project or Alternative 5. Moreover, it should be noted that CEQA does not mandate analysis of effects

of existing environmental conditions on proposed projects (see *CBIA v. BAAQMD*).[11] Compliance with the applicable policies and programs in the General Plan, as well applicable BAAQMD rules and regulations, would ensure that specific sites that may be developed under the Project or Alternative 5 would not emit TACs that could expose sensitive receptors to substantial pollutant concentrations. Because Alternative 5 would introduce one additional Opportunity Site to a location within 500 feet of Highway 101, impacts would be slightly worse than under the Project. However, because both the Project and Alternative 5 would be governed by the same policies, sensitive receptors would not be exposed to substantial pollutant concentrations under the Project or Alternative 5. Therefore, the impact is ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-10	**Development facilitated by Alternative 5 would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. (See Impact 3.2-4 for Project impacts related to this topic)**

Under the BAAQMD CEQA Guidelines, a plan-level environmental analysis must identify locations of odor sources in the plan and identify goals, policies, and objectives to minimize potentially adverse impacts.

Objectionable odors can be generated from certain types of commercial and/or industrial land uses. Common odor-generating uses include manufacturing, food processing, composting, landfills, and institutional or municipal facilities such as water and wastewater treatment plants. The closest potential existing odor source is the Sausalito-Marin City Sanitary District Wastewater Treatment Plant located south of the City of Sausalito. However, these types of heavy and industrial uses would not be permitted in the mixed use zone proposed as part of the Project or Alternative 5. Moreover, in general, residential land uses are not associated with odor generation, but they do serve as sensitive receptors. Odors rarely have direct health impacts, but they can be unpleasant and can lead to anger and concern over possible health effects among the public. Each year the BAAQMD receives thousands of citizen complaints about objectionable odors. The BAAQMD CEQA Guidelines recommendation for assessing plan level odor impacts is to "identify the location of existing

[11] Website: https://climatecasechart.com/case/california-building-industry-association-v-bay-area-air-quality-management-district/

and planned odor sources in the plan area and policies to reduce potential odor impacts in the plan area."

Neither the Project nor Alternative 5 include any sources of objectionable odors or other emissions adversely affecting a substantial number of people. As stated in the BAAQMD CEQA Guidelines, land uses that typically produce objectionable odors include agricultural uses, wastewater treatment plants, food manufacturing plants, chemical plants, composting, refineries, landfills, and confined animal facilities. The Project and Alternative 5 do not include any such land uses. Rather, projected development under the Project and Alternative 5 would include typical residential and mixed-use development, and would include uses that are not anticipated to produce objectionable odors. Therefore, compliance with the applicable policies and programs in the General Plan as well applicable BAAQMD rules and regulations, would minimize odor emissions from adversely affecting a substantial number of people within the city. Odor impacts under the Project and Alternative 5 would be identical, and impacts would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-11	**Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to air quality. (See Impact 3.2-4 for cumulative plus Project impacts related to this topic)**

This analysis evaluates whether the impacts of Alternative 5, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to air quality. This analysis then considers whether the incremental contribution of the impacts associated with the implementation of Alternative 5 would be significant. Both conditions must apply in order for a project's cumulative effects to rise to the level of a significant impact.

The geographic context for the analysis of cumulative impacts related to air quality includes the Air Basin. Cumulative development within the Air Basin would be consistent with Plan Bay Area 2050, which projects significant population growth and accompanying development. As discussed in the Plan Bay Area 2050 EIR, the State has identified air basin–specific pollutants that have exceeded applicable federal and State pollutant standards. Any area that exceeds applicable standards for a particular pollutant is typically referred to as a

"nonattainment" area for that pollutant. In addition, the BAAQMD has prepared an area-specific air quality plan to improve air quality conditions within its jurisdiction to meet federal and State pollutant standards for those pollutants that currently exceed standards. Although each jurisdiction within the Bay Area, including BAAQMD, is primarily responsible for regulating its own emissions, pollutant transport, which is a result of a variety of topographical and atmospheric conditions that cause pollution generated in one location to move to another location (including a neighboring air basin), can result in one area's emissions affecting another's ability to achieve applicable pollutant standards. Because the BAAQMD is currently designated as a nonattainment area for one or more pollutants for which federal and/or State standards exist, a significant cumulative impact exists.

While implementation of Alternative 5 is intended to promote infill development, reduce VMT, and increase overall sustainability, implementation of Alternative 5 could result in substantial increases in pollutant emission levels (PM_{10} and $PM_{2.5}$) during construction and operational activities associated with future growth and development patterns. Development envisioned by Alternative 5 could result in an incremental increase in new development is likely to lead to increases in criteria pollutant emissions within the Air Basin that is in non-attainment for ozone, PM_{10} and $PM_{2.5}$ air quality standards.

However, as described under Impact 4.5-8, Alternative 5 would not generate emissions that would exceed the applicable BAAQMD air quality thresholds of significance. Furthermore, as described under Impact 4.5-8, Alternative 5 would have a less-than-significant impact relative to greenhouse gases. Alternative 5 would also be consistent with the applicable AQMP (i.e., the 2017 Bay Area Clean Air Plan). Thus, Alternative 5's consistency with the 2017 Bay Area Clean Air Plan would be considered less than significant. Therefore, in combination with past, present, and reasonably foreseeable projects, Alternative 5 would not result a significant cumulative impact with respect to air quality and impacts would be ***less than significant***, as it would be under the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Biological Resources

Information regarding the existing setting, regulatory setting, and thresholds of significance for Biological Resources impacts can be found on pages 3.3-1 through 3.3-24 in Section 3.3, Biological Resources, of the Draft EIR.

Impact 4.5-12 With mitigation, development facilitated by Alternative 5 would not have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species. (See Impact 3.3-1 for Project impacts related to this topic)

As discussed in the Existing Setting section of Section 3.3, Biological Resources, five special-status plant species and 13 special-status animal species have been recorded to occur within the Sausalito Planning Area. The special-status animal species include five bird species, four fish species, three invertebrate species, and one mammal species. Many other special-status plant and animal species have been documented in the nine-quadrangle search area surrounding the Planning Area, including 89 plant species (see Table 3.3-2) and 56 animal species (25 bird species, 10 fish species, 7 invertebrate species, and 14 mammal species) (see Table 3.3-3). Subsequent development could result in the direct/indirect loss or indirect disturbance of special-status plant or animal species or their habitats that are known to occur, or have potential to occur, in the region.

Both the Project and Alternative 5 have the potential to impact California red-legged frog and California giant salamander directly through crushing or removal during grading, or indirectly through hydrological impacts to habitat. The Project has and Alternative 5 have the potential to impact American badger and their dens through crushing or removal during grading.

The Project and Alternative 5 have the potential to impact Townsend's big-eared bat through removal of roost trees and structures. Removing a roost tree or building during breeding or hibernating seasons could kill many bats as they roost together in a colony. Bats are unusual for small mammals because they are long-lived and have a low reproductive rate (Johnston 2004). Lifespans of 15 years are not uncommon, and most species have only one young per pair per year.[12] Bats also aggregate in colonies, some of which contain all the bats of a species from a wide area.[13] The combination of these three factors (long lifespan, few young per year, and aggregation into colonies) means that if the Project impacts bat roosts, the Project may cause a substantial adverse effect to the regional population of Townsend's big-eared bat.

[12] Johnston, D, Tartarian, G, and Poerson, E. (2004). California Bat Mitigation Techniques, Solutions, and Effectiveness. Sacramento, CA.

[13] Johnston, D, Tartarian, G, and Poerson, E. (2004). California Bat Mitigation Techniques, Solutions, and Effectiveness. Sacramento, CA.

All of the species above are listed as California Species of Special Concern (SSC); California red-legged frog is also listed as threatened under the Federal Endangered Species Act (ESA). CDFW designates certain vertebrate species as SSC because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction or extirpation in California. As such, impacts to species designated as SSC may be significant.

Franciscan thistle has a California Rare Plant Rank (CRPR) of 1B.2. Plants with a CRPR of 1B are rare throughout their range, endemic to California, and are seriously or fairly threatened. Most plants that are ranked 1B have declined significantly over the last century.[14] The additional threat rank of 0.2 indicates that 20 to 80 percent of their occurrences are threatened.[15] Franciscan thistle could be directly impacted through crushing or removal during grading, or indirectly through hydrological impacts to habitat. Additional special-status plant species may also occur. If special-status plants occur within or adjacent to the Project site and would be directly or indirectly impacted by the Project, the Project may result in significant impact to special-status plants.

Significant impacts on special-status plant species associated with individual subsequent projects under the Project or Alternative 5 could include the direct loss of individual plants and of habitat areas associated with these special-status plant species. Indirect impacts to special-status plant species could include habitat degradation as a result of impacts to water quantity and quality. These impacts would be similar between the Project and Alternative 5 as the Opportunity Sites are spread throughout the city and are not concentrated in one area that is more biologically important than another.

Significant impacts on special-status animal species associated with individual subsequent projects under the Project or Alternative 5 could include, but are not limited to, the following:

- Increased mortality caused by higher numbers of automobiles in new areas of development;
- Direct mortality from the collapse of underground burrows or dens, resulting from soil compaction;
- Direct mortality resulting from the movement of equipment and vehicles through construction areas;
- Direct mortality resulting from removal of trees with active nests or roosts;
- Direct mortality or loss of suitable habitat resulting from the trimming or removal of obligate host plants;
- Direct mortality or loss of suitable habitat resulting from building demolition;
- Direct mortality resulting from the filling of wetlands features;
- Loss of breeding and foraging habitat resulting from the filling of seasonal or perennial wetlands;

[14] California Native Plant Society (CNPS), 2024. Inventory of Rare and Endangered Plants of California.
[15] California Native Plant Society (CNPS), 2024. Inventory of Rare and Endangered Plants of California.

- Loss of breeding, foraging, and refuge habitat resulting from the permanent removal of riparian vegetation;
- Loss of suitable habitat for vernal pool invertebrates resulting from the destruction or degradation of vernal pools or seasonal wetlands;
- Abandonment of eggs or young and subsequent nest failure for special-status nesting birds, including raptors, and other non-special status migratory birds resulting from construction-related noises;
- Loss or disturbance of rookeries and other colonial nests;
- Loss of suitable foraging habitat for special-status raptor species;
- Loss of migration corridors resulting from the construction of permanent structures or features;
- Impacts to fisheries/species associated with waterways;
- Impacts to eelgrass habitats from growth along waterfront.

Special-status plant and animal species receive protection from various federal and State laws and regulations, including FESA and CESA. These regulations generally prohibit the taking of protected plant and animal species, or direct impacts to foraging or breeding habitat, without a special permit.

The General Plan includes policies and programs specifically designed to address these potential impacts to biological resources, which would apply to both the Project and Alternative 5. Policy EQ-1.4 plainly states that threatened and endangered species shall be protected under the General Plan. To protect special-status species, Program EQ-1.1.1 requires new developments to identify and protect natural resources as conditions of project approval. Other policies found in the General Plan recognize the importance of protecting valuable wildlife habitat. Policy W-4.2 and Program W-4.2.2 call for preservation and enhancement of the open waters and habitats found in Richardson Bay, which have high ecological value for marine species such as eelgrass. Policy W-4.1 requires that no net loss of ecological functions occur as a result of uses, development, shoreline modifications, or expansion of existing uses. Program EQ-1.4.1 Special Studies (Threatened and Endangered Species) requires special studies for projects proposed in areas that could potentially impact threatened or endangered species habitat as identified in the Endangered Species Act. Program EQ 1.4.2 requires that the city continue to catalogue and update information on threatened and endangered species and locally scarce species or habitats, and that this information will be used to review project proposals. Program ES 1.4.3 requires applicants to prepare a detailed botanical report for projects within threatened plant habitat areas.

Future development under the Project and Alternative 5 would comply with the various federal and State laws and regulations that protect special-status plant and animal species, including FESA and CESA. In addition, future projects under the Project and Alternative 5 would comply with requirements of the Sausalito Municipal Code and the General Plan policies and programs related to biological resources. However, individual opportunity sites

may acquire special species over time, such as new species nesting on a vacant parcel. Therefore, the impact to special status species under both the Project and Alternative 5 is ***potentially significant***.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures

MM 4.5-12a Special Studies. Applicants of any projects that could result in a potential impact to special status species, or their habitat, shall be required to prepare a special study. The purpose of the special study is to identify appropriate measures to avoid or minimize harm to sensitive biological resources and to incorporate the recommended measures as conditions of approval for the project. If special-status plant or animal species may be present on a project site, a Qualified Biologist shall conduct a preconstruction survey within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If special-status species are identified on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified. Construction activities may resume when the Qualified Biologist determines that the species has moved out of harm's way through its own volition, the species may be safely relocated to similar habitat without loss of active nests or dens, or the nesting/breeding season for the special-status species concludes.

Detailed studies are not necessary in locations where past and existing development have eliminated natural habitat and the potential for the presence of sensitive biological resources.

MM 4.5-12b California red-legged frog. At any opportunity site west of U.S. Highway 101 or within 1,000 feet east of U.S. Highway 101, at least one month prior to the commencement of ground-disturbing activities, the opportunity site and a minimum 500-foot radius surrounding the opportunity site shall be assessed by a Qualified Biologist for the presence of California red-legged frog individuals and habitat features. Habitat features include both aquatic habitat such as plunge pools and ponds and terrestrial habitat such as burrows or other refugia. If habitat occurs, then no more than 48 hours prior to ground-disturbing activities the area shall be surveyed by a Qualified Biologist. Burrows and refugia sites shall be flagged or otherwise marked for avoidance; project construction activities shall avoid habitat features to the extent feasible. If California red-legged frogs are encountered during the assessment or project construction, the project activity shall not proceed or all work shall cease, and CDFW and USFWS shall immediately be notified. Work shall not proceed until the frog, through its own volition, moves out of harm's way and CDFW

has provided permission in writing to proceed with the project construction. If California red-legged frog is encountered or the Qualified Biologist determines that impacts to the species are likely to occur, the opportunity site project applicant shall consult with USFWS pursuant to the Federal ESA and receive written approval from CDFW prior to the impact.

MM 4.5-12c California giant salamander. At any opportunity site that is both: 1) within 500 feet of a stream, and 2) either west of U.S. Highway 101 or within 1,000 feet east of U.S. Highway 101, a Qualified Biologist shall conduct a preconstruction survey for California giant salamander within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If California giant salamanders are found on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified, and the animal shall be allowed to move out of harm's way through its own volition. If the California giant salamanders must be disturbed, a Qualified Biologist shall relocate the animals into nearby suitable habitat that is out of harm's way.

MM 4.5-12d American badger. At any opportunity site west of U.S. Highway 101, a Qualified Biologist shall conduct a pre-construction survey for American badger and suitable dens within 48 hours of the commencement of ground-disturbing activities. The survey area shall include the opportunity site and a 50-foot buffer zone within suitable habitat. If badgers are found on or adjacent to the project site, a 50-foot construction avoidance buffer shall be established and CDFW shall be immediately notified. If the occupied den must be disturbed, the opportunity site project applicant shall submit a relocation plan to CDFW and obtain CDFW's written approval of the plan, and a Qualified Biologist shall implement the CDFW-approved plan.

MM 4.5-12e Nesting Bird Protection. All projects shall retain the services of a qualified biologist(s) to conduct a pre-construction nesting bird survey during the nesting season (February 1 through August 31) prior to any and all development that may remove trees or vegetation that may provide suitable nesting habitat for migratory birds or other bird species protected under the Fish and Game Code. If nests are found, the qualified biologist(s) shall identify and the project sponsor shall implement appropriate avoidance measures, such as fenced buffer areas or staged tree removal periods.

MM 4.5-12f Bat Roosts. Construction activities associated with removal of landscape and riparian trees, or the removal of an existing building, on opportunity sites shall occur between September 1 and April 30, which is outside of the breeding season for bat species, to the extent feasible.

If removal of landscape and riparian trees begin during the breeding period for bats (May 1 through August 31), a qualified biologist shall conduct a preconstruction

survey within five days prior to the scheduled tree removal. The biological shall inspect all trees containing crevices and the bark or cavities for evidence of sign (i.e., guano). If no sign is observed, a letter report shall be submitted to the City for its records within 14 days of the survey and no additional measures associated with tree removal are required. If tree removal does not begin within five days of the preconstruction survey, or if the removal of previously inspected trees halts for more than five days, an additional preconstruction survey is required within five days of the initiation or re-initiation of tree removal. If a maternity colony is observed within a tree, that tree shall not be removed until the breeding season has been completed. Alternatively, a qualified bat biologist may exclude individual day-roosting bats in consultation with CDFW, thereby allowing tree removal to continue after successful exclusion activities.

If construction activities on opportunity sites are anticipated to occur during the breeding season (May 1 through August 31), a qualified biologist shall conduct a nighttime emergence survey no later than one-half hour before sunset and continue until at least 3 hours after sunset to allow for detection of both day- and night-roosting bats. The survey shall be conducted within five days of the removal of landscape and riparian trees, or the removal of onsite buildings. If any bats are observed emerging from any of the buildings, the building(s) shall not be demolished until the breeding season has been completed.

MM 4.5-12g Townsend's big-eared bat. At any Project site where trees or abandoned buildings would be removed or heavily modified, prior to Project activities that would remove trees or modify buildings, a Qualified Biologist shall conduct a habitat assessment for bats. A Qualified Biologist shall have: 1) at least two years of experience conducting bat surveys that resulted in detections for relevant species, such as Townsend's bat, with verified project names, dates, and references, and 2) experience with relevant equipment used to conduct bat surveys. The habitat assessment shall be conducted a minimum of 30 to 90 days prior to the beginning of Project activities.

For tree removal, the habitat assessment shall include a visual inspection of potential roosting features (e.g., cavities, crevices in wood and bark, exfoliating bark for colonial species, suitable canopy for foliage roosting species). If suitable habitat is found, it shall be flagged or otherwise clearly marked. Trees shall be removed only if: a) presence of bats is presumed, or documented during the surveys described below, in trees with suitable habitat, and removal using the two-step removal process detailed below occurs only during seasonal periods of bat activity, from approximately March 1 through April 15 and September 1 through October 15, or b) after a Qualified Biologist conducts night emergence surveys or completes visual examination of roost features that establish absence of roosting bats. Two-step tree removal shall be conducted over two consecutive days, as follows: 1) the first day (in the afternoon),

under the direct supervision and instruction by a Qualified Biologist with experience conducting two-step tree removal, limbs and branches shall be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices, or deep bark fissures shall be avoided, and 2) the second day the entire tree shall be removed.

For modification of buildings, the Qualified Biologist shall conduct a survey for roosting bats. If roosting bats are detected, a bat avoidance and exclusion plan shall be implemented. The plan shall recognize that both maternity and winter roosting seasons are vulnerable times for bats and require exclusion outside of these times, generally between March 1 and April 15 or September 1 and October 15 when temperatures are sufficiently warm. Work operations shall cease if bats are found roosting within the Project area and CDFW shall be consulted.

For loss of suitable bat habitat trees or impacts to buildings or structures occupied by bats subject to the above bat avoidance and exclusion plan, the Project shall provide habitat mitigation in the form of: 1) native tree planting at an appropriate ratio to offset canopy and temporal habitat loss and tree planting maintenance for a minimum of 5 years and until success criteria are met, or 2) suitable bat habitat structures. A Qualified Biologist shall prepare and submit a bat habitat mitigation plan to CDFW and obtain CDFW's approval of the plan prior to the start of Project activities, and shall implement the plan, unless otherwise approved in writing by CDFW.

MM 4.5-12h Franciscan thistle (*Cirsium andrewsii*). Prior to issuance of a demolition, grading, or building permit, a qualified plant biologist approved by CDFW shall conduct a preconstruction survey for Franciscan thistle (*Cirsium andrewsii*) (blooms June-July) on opportunity sites. The survey shall be conducted following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and* Natural *Communities*.[16] If special-status plant species (e.g., Franciscan thistle) are found, the project applicant shall prepare a transplantation and monitoring plan in consultation with CDFW. The transplantation and monitoring plan will be subject to review and approval by CDFW before the start of any construction activities in the special-status plant species area. This plan will describe the intent and anticipated success of transplanting, and specify success criteria for transplanted plants and related long-term protection and management of transplanted plants. Other methods of minimizing impacts on the resource may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.

[16] California Department of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Sacramento, CA.

Level of Significance after Mitigation
Less than Significant

Mitigation Measure 4.5-12 is included to specifically require the preparation of survey reports for special-status species that may be encountered on individual project sites. These surveys shall prompt preparation of a report detailing how the project could avoid, relocate, or otherwise minimize impacts on the special-status species or their habitat. The report would identify appropriate measures to minimize or avoid harm from project implementation upon identified species and their habitat.

Therefore, with mandatory regulatory compliance and implementation of Mitigation Measure 4.5-12, future development under both the Project and Alternative 5 would not result in significant adverse effects to biological resources and impacts would be less than significant. As such, impacts from implementation of both the Project and Alternative 5 would be similar, and would be considered ***less than significant with mitigation*** relative to this topic.

Impact 4.5-13	**With mitigation, development facilitated by Alternative 5 would not have a substantial adverse effect on riparian habitats, other sensitive natural communities, federally protected wetlands, or waters of the United States and/or State, through direct removal, filling, or hydrological interruption. (See Impact 3.3-2 for Project impacts related to this topic)**

As discussed in the Existing Setting section of Section 3.3, Biological Resources, sensitive natural communities located in the vicinity of the Sausalito Planning Area: Coastal Brackish Marsh, Coastal Terrace Prairie, Northern Coastal Salt Marsh, Northern Maritime Chaparral, Serpentine Bunchgrass, and Valley Needlegrass Grassland. None of these sensitive natural communities are located within the City of Sausalito City Limits. However, eelgrass is present in Richardson Bay. Eelgrass is designated as Essential Fish Habitat and is listed as a Sensitive Natural Community.

While not always documented as sensitive natural communities in the CNDDB, streams, rivers, and estuaries are of high concern because they provide unique aquatic habitat for many endemic species, including special-status plants, birds, invertebrates, amphibians and fish species. These aquatic habitats oftentimes qualify as protected wetlands or jurisdictional waters and are protected from disturbance through the Clean Water Act.

Subsequent development under both the Project and Alternative 5, primarily adjacent to Richardson Bay, could result in direct or indirect effects on estuarine habitat and other sensitive marine communities. Federally protected wetlands and other waters of the United States and/or State could be affected through direct removal, filling, hydrological interruption (including dewatering), alteration of bed and bank, and other construction-related activities.

Riparian habitats and sensitive natural communities receive protection under the California Fish and Game Code (FGC §§ 1601–1603). Any proposed activities, under both the Project and Alternative 5, that would divert or obstruct the natural flow or change the bed, channel, or bank of any lake or stream, must obtain a "Streambed Alteration Agreement" from CDFW prior to any alteration of a lake bed, stream channel, or their banks. Through this agreement, the CDFW may impose conditions to limit and fully mitigate impacts on fish and wildlife resources.

Figure 3.3-2 shows the wetlands in the Planning Area. Section 404 of the Clean Water Act requires any project that involves disturbance to a wetland or waters of the United States to obtain a permit that authorizes the disturbance. If a wetland or jurisdictional water is determined to be present, then a permit must be obtained from the USACE to authorize a disturbance to the wetland. Although subsequent projects may disturb protected wetlands and/or jurisdictional waters, the regulatory process that is established through Section 404 of the Clean Water Act ensures that there is "no net loss" of wetlands or jurisdictional waters. If, through the design process, it is determined that a future development project proposed under the Project or Alternative 5 cannot avoid a wetland or jurisdictional water, then the USACE would require that there be an equal amount of wetland created elsewhere to mitigate any loss of wetland.

Section 401 of the Clean Water Act (33 USC § 1341) requires an applicant who is seeking a 404 permit to first obtain a water quality certification from the RWQCB. To issue a water quality certification, the RWQCB must indicate that the proposed fill is consistent with the standards set forth by the State.

The General Plan includes policies and programs designed to protect riparian habitat and other sensitive natural communities, as well as protect wetlands and waters of the United States and/or waters of the State. These policies and programs would apply equally to the Project and Alternative 5. Policy W-4.1 requires that no net loss of ecological functions occur as a result of uses, development, shoreline modifications, or expansion of existing uses. Policy W-4.2 and Program W-4.2.2 require the preservation and enhancement of open waters and ecosystem of Richardson and San Francisco Bays. Policy W-4.3 calls for the preservation of the undeveloped open shoreline and shoreline habitat. Policy EQ-4.3 preserves the natural integrity of creeks and riparian habitat, as these areas provide numerous ecological and hydrological benefits including but not limited to providing wildlife habitat, maintaining water quality and providing protection against flooding. In addition, Chapter 10.40.070 of the Sausalito Municipal Code prohibits development within 20 feet of the 100-year flood elevation line of an open natural drainage way or creek identified in the General Plan. Future development in accordance to the Amended Housing Element would be subject to these General Plan policy and Municipal Code requirements.

Future development facilitated by the Project and Alternative 5 would comply with adopted State, federal, and local regulations for the protection of sensitive natural communities,

including riparian habitat, wetlands, and waters of the United States and/or State. In addition, future projects under the Project and Alternative 5 would comply with requirements of the Sausalito Municipal Code and the General Plan policies and programs related to the protection of these biological resources. While impacts to riparian habitat, wetlands, and streams would be similar under Alternative 5 as compared to the Project, individual opportunity sites may acquire special species over time, such as new plants growing on a vacant parcel. Therefore, the impact to riparian habitats, other sensitive natural communities, federally protected wetlands, or waters of the United States and/or State under both the Project and Alternative 5 is ***potentially significant***.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures

MM 4-5-13a Botanical Reports and Special-Status Plant Survey. At all opportunity sites not composed of hardscape or ornamental vegetation, a Qualified Biologist shall conduct botanical surveys during the appropriate blooming period and conditions for all special-status plants that have the potential to occur at the opportunity site and adjacent to it where plants could be indirectly impacted, prior to the start of construction. Surveys shall be conducted following CDFW's *Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*[17] and include checking reference sites for target special-status plant species. Per this protocol, more than one year of surveys may be necessary if, for example, lack of rain inhibits growth of annual plants. If any special-status plant species are observed, the opportunity site project applicant shall fully avoid direct and indirect impacts to all individuals and provide an avoidance plan to CDFW and obtain CDFW written approval of the plan. If full avoidance is not possible, project activities may not commence until the opportunity site project applicant has consulted with CDFW and obtained CDFW's written approval prior to the start of construction, which may include salvaging topsoil, transplanting and monitoring individuals, compensatory habitat mitigation, or other measures, based on the life history of the species and other relevant factors.

MM 4.5-13b Eelgrass (*Zostera marina*) beds and red algae (*Gracilaria sp.*). Prior to issuance of a demolition, grading, or building permit, a qualified plant biologist approved by CDFW shall conduct a preconstruction survey for eelgrass and red algae during their blooming periods on opportunity sites that are located within or adjacent to Richardson Bay's aquatic ecosystem. The survey shall be conducted following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and*

[17] California Department of Fish and Wildlife, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Available: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants. Accessed: November 27, 2024.

Natural Communities.[18] If special-status plant species (e.g., eelgrass and red algae) are found, the project applicant shall prepare a transplantation and monitoring plan in consultation with CDFW. The transplantation and monitoring plan will be subject to review and approval by CDFW before the start of any construction activities in the special-status plant species area. This plan will describe the intent and anticipated success of transplanting, and specify success criteria for transplanted plants and related long-term protection and management of transplanted plants. Other methods of minimizing impacts on the resource may include avoidance of the resource, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, off-site mitigation, and/or other similar measures as determined on a project-specific basis.

MM 4.5-~~11~~13c Stream and Wetland Mitigation and Resource Agency Permits. Development on each opportunity site shall be designed to avoid and minimize impacts to streams, wetlands, and other waters. If impacts to any streams cannot be avoided, then prior to the impacts the opportunity site project applicant shall submit an LSA notification to CDFW and comply with the Streambed Alteration Agreement, if issued. Additionally, if impacts to any streams, wetlands, or other waters cannot be avoided, the opportunity site project applicant shall obtain authorization from the RWQCB and USACE pursuant to the Porter-Cologne Water Quality Control Act and Clean Water Act sections 401 and 404, as applicable. Impacts to waters, wetlands, and riparian habitat subject to the permitting authority of CDFW, the RWQCB, or the USACE shall be mitigated by providing restoration at a minimum 3:1 restoration to impact ratio in areas for permanent impacts and 1:1 ratio for temporary impacts, unless otherwise approved in writing by CDFW or otherwise required by the RWQCB or USACE. A Habitat Mitigation and Monitoring Plan shall be prepared by the opportunity site project applicant and implemented for the proposed mitigation. The opportunity site project applicant shall obtain written approval of this plan from CDFW, the RWQCB, or the USACE as applicable prior to any disturbance of stream or riparian habitat, wetlands, or other waters.

Level of Significance after Mitigation
Less than Significant

Mitigation Measure 4.5-13a is included to specifically require the preparation of a botanical report for projects that could potentially affect threatened plant habitat areas or Sensitive Natural Communities, through the identification of recommendations to avoid or minimize harm to these habitat areas. Mitigation Measure 4.5-13b seeks to protect sensitive eelgrass habitats that are located within or adjacent to Richardson Bay's aquatic ecosystem. In addition, Mitigation Measure 4.5-13c is included to avoid and minimize impacts to streams,

[18] California Department of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Sacramento, CA.

wetlands, and other waters by obtaining appropriate permits to protect water quality and impacts to sensitive habitats.

Therefore, with mandatory regulatory compliance and implementation of Mitigation Measure 4.5-13, future development under both the Project and Alternative 5 would not result in significant adverse effects to riparian habitat, other sensitive natural communities, federally protected wetlands, waters of the United States, or waters of the State. Impacts under the Project and Alternative 5 would be similar, and would be considered ***less than significant with mitigation*** under this criterion for both the Project and Alternative 5.

Impact 4.5-14	**With mitigation, development facilitated by Alternative 5 would not 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. (See Impact 3.3-3 for Project impacts related to this topic)**

As described in the Existing Setting section of Section 3.3, Biological Resources, the undeveloped areas west of Highway 101 currently allow for wildlife movement within the city limits and serve as a wildlife corridor to the adjacent GGNRA lands. In addition, the urban forest canopy can support movement of a variety of migratory bird species, while city open space areas, creeks, and un-named drainages could serve as aquatic and terrestrial wildlife migration corridors within the Sausalito Planning Area. The city open space areas include the Cypress Ridge Open Space Preserve, the Sausalito Creek Wildlife Refuge, and the Sausalito Highlands (known locally as the Green Corridor). Species using these corridors include aquatic, terrestrial, and avian species.

Future development facilitated by the Project and Alternative 5 would comply with adopted State, federal, and local regulations for the protection of biological resources. In addition, future projects proposed under both the Project and Alternative 5 would comply with requirements of the Sausalito Municipal Code and the General Plan policies and programs related to biological resources.

Many of the General Plan policies presented in Section 3.3, Biological Resources, have ancillary benefits of protecting movement habitat for wildlife, which would apply to both the Project and Alternative 5. Policy EQ-4.3 promotes the natural integrity of creeks and riparian habitat, as these areas could serve as important corridors for the movement of wildlife. Policy EQ-1.2 reduces potential impacts on wildlife movement by advocating for the protection of natural terrain and vegetation found in the City of Sausalito. As noted previously, future development associated with the Project and Alternative 5 would be subject to these General Plan policy requirements.

Although migratory wildlife corridors do not appear to be present, it is possible that such corridors could be established prior to construction on opportunity sites. Both Alternative 5 and the Project have opportunity sites that are largely infill in nature, and some are vacant,

but many are underutilized urban parcels. However, implementation of Alternative 5 or the project could interfere 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. Therefore, the impact to native and migratory fish and wildlife species or native wildlife nurseries is ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures

MM 4.5-14 Implement Mitigation Measure 3.3-3.

Wildlife Movement. All projects on parcels with indicators of wildlife movement corridors shall retain the services of a qualified biologist(s) to conduct a biological assessment prior to any and all development that may impact wildlife movement. If movement corridors are potentially impacted by the proposed project, the qualified biologist(s) shall identify appropriate mitigation measures to avoid or minimize the impact such that take of a sensitive species does not occur. If actions would impact wildlife corridors such that special-status species would be impacted, the project applicant shall obtain the appropriate permits from regulatory agencies, such as the California Department of Fish and Wildlife or the US Department of Fish and Game, for example and as appropriate, as to minimize or eliminate take. Such measures shall be a condition of approval and implemented by the project applicant.

Level of Significance after Mitigation
Less than Significant

Mitigation Measure 4.5-~~12~~14 is included to specifically require a biological assessment for any project that may impact a wildlife movement corridor. Therefore, future development under both the Project and Alternative 5 would not result in significant adverse effects to fish or wildlife corridors or native wildlife nursery sites. Impacts under the Project and Alternative 5 would be similar, and impacts would be considered ***less than significant with mitigation*** under this criterion for both the Project and Alternative 5.

Impact 4.5-15 **Development facilitated by Alternative 5 would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (See Impact 3.3-4 for Project impacts related to this topic)**

Implementation of the Project and Alternative 5 would be subject to all applicable local policies and regulations related to the protection of important biological resources. Specifically, development under the General Plan would be required to comply with the City's Tree Ordinance.

Chapter 11.12 of the Sausalito Municipal Code acknowledges the contribution of trees to the character and beauty of the city and provides guidelines to address potential conflict between preservation of trees and view-related values. Chapter 17.28 of the Municipal Code goes further and describes protections for trees in the public realm, including prohibitions against cutting, pruning, injuring, removing or spraying public trees, as well as prohibitions against attaching appurtenances or interfering with work on trees by city employees. All development facilitated by the Project and Alternative 5 would be subject to these mandatory tree preservation requirements.

Therefore, there is no potential for conflicts with local policies or ordinances protecting biological resources for either the Project or Alternative 5. Impacts under the Project and Alternative 5 would be similar, and impacts for both the Project and Alternative 5 would be ***less than significant***.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-16 **Development facilitated by Alternative 5 would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. (See Impact 3.3-5 for Project impacts related to this topic)**

As discussed in the Regulatory Setting section in Section 3.3, Biological Resources, the GGNRA encompasses 80,500 acres of land and water extending from Tomales Bay in Marin County to San Mateo County. Approximately 182 acres of GGNRA land is located within the Sausalito city limits.

The BCDC has jurisdiction over all areas of San Francisco Bay that are subject to tidal action. Tidal action is defined as any area by the shoreline that extends up to mean high water,

except in marsh areas, where BCDC's jurisdiction extends to five feet above mean sea level. The BCDC also has "shoreline band" jurisdiction over an area 100 feet wide inland and parallel to the shoreline. For projects within BCDC jurisdiction, permits may be required depending on the nature of the activity. Those projects requiring a permit must comply with the requirements of the McAteer-Petris Act and the Bay Plan.

There are no other local, regional, or State habitat conservation plans that are applicable to the Sausalito Planning Area. As such, implementation of the Project and Alternative 5 would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, impacts on areas protected by habitat conservation plans would be the same under Alternative 5 as under the Project. Implementation of the Project and Alternative 5 would have a ***less than significant*** impact relative to this topic.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-17	**Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to biological resources. (See Impact 3.3-6 for cumulative plus Project impacts related to this topic)**

The geographic context for analysis of cumulative impacts to biological resources includes the incorporated and unincorporated lands surrounding the Sausalito Planning Area. This analysis evaluates whether the impacts of the Amended Housing Element, together with the impacts of cumulative development, would result in a cumulatively significant impact on special-status species; wetlands and other Waters of the United States and/or State; or other biological resources protected by federal, State, or local regulations or policies. This analysis then considers whether incremental contribution to cumulative impacts associated with the implementation of the Amended Housing Element would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of significance.

Cumulative development within unincorporated Marin County is identified in the Marin Countywide Plan Update Final EIR. Cumulative development contributes to an incremental reduction in the amount of existing wildlife habitat, particularly for birds and larger mammals. Habitat for species intolerant of human disturbance can be lost as development encroaches into previously undeveloped areas, disrupting or eliminating movement corridors, and fragmenting the remaining suitable habitat retained within parks, private

open space, or undeveloped properties. New development in the region would result in further conversion of existing natural habitats to urban and suburban conditions, limiting the existing habitat values of the surrounding area. This could include further loss of wetlands and sensitive natural communities, reduction in essential habitat for special-status species, removal of mature native trees and other important wildlife habitat features, and obstruction of important wildlife movement corridors. Additional development may also contribute to degradation of the aquatic habitat found in Richardson and San Francisco Bay throughout the region, including the Sausalito Planning Area.

As described in the Regulatory Setting section of Section 3.3, Biological Resources, numerous laws and regulations are in place to protect biological resources, including, but not limited to, CESA, FESA, and the Clean Water Act. The BCDC has jurisdiction over all areas of San Francisco Bay that are subject to tidal action. Development facilitated future projects within the cumulative geographic context, would be required to comply with federal, State, and local laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources. Because cumulative development would be required to comply with the above requirements, as well as the overall land use vision, design review regulations and policies in local and regional plans, including the Marin Countywide Plan and Marin County Development Code, cumulative impacts to biological resources would be ***less than significant***, as it would be under the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Cultural and Tribal Cultural Resources

Information regarding the existing setting, regulatory setting, and thresholds of significance for Cultural and Tribal Cultural Resources impacts can be found on pages 3.4-1 through 3.4-36 in Section 3.4, Cultural and Tribal Cultural Resources, of the Draft EIR.

Impact 4.5-18 Implementation of Alternative 5 could result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. (See Impact 3.4-1 for Project impacts related to this topic)

A substantial adverse change in the significance of an historical resource is defined at Section 15064.5(b)(1) of the CEQA Guidelines as the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." Known historic buildings, districts and resource sites are located throughout the city, as shown on Figure 3.4-1 in Section 3.4, Cultural and Tribal Cultural Resources. Additional undesignated sites, and potentially unidentified sites, exist within the Planning Area as well.

Implementation of the Project and Alternative 5 would not directly construct new housing in the City but, through the adoption of new development standards and rezoning of sites to residential or mixed use, they would facilitate new residential development on specific sites in order to meet the City's RHNA allocation. Development accommodated under implementation of both the Project and Alternative 5 would result in additional residential development throughout the city, including along the waterfront areas and would occur primarily on sites identified as Inventory Sites and Opportunity Sites in Chapter 2.0. The ODDS would establish a process and standards for multifamily projects eligible for streamlined review on sites zoned for multifamily (2 or more units) residential and mixed use development. The potential growth in residential uses would be infill development and would occur within the fabric of developed areas throughout the City.

Both the Project and Alternative 5 would accommodate residential and mixed use development on Inventory Sites and on Opportunity Sites currently designated for residential and mixed uses.

The Project identifies five properties anticipated for potential residential development, which would also be developed under Alternative 5, that are within or adjacent to the Downtown Historic District:

- Opportunity Site 201 is within the Downtown Historic District and currently consists of a commercial building with four retail storefronts, and a surface parking lot;
- Amended Housing Element Inventory Site, located at 721/729 Bridgeway, is within the Downtown Historic District and contains a commercial building;
- Opportunity Site 23 is adjacent to, but outside of, the Downtown Historic District, and is currently vacant;

- Opportunity Site 24 is adjacent to, but outside of, the Downtown Historic District, and is currently vacant; and
- Opportunity Site 202 is adjacent to, but outside of, the Downtown Historic District and currently houses the Alta Mira Recovery Programs surface parking lots and two small buildings.

Opportunity Site 201 (APN 065-132-16) is located within the Sausalito Historic District and contains the Marin Fruit Co., a designated historic resource listed on the California Historic Preservation Office state registry and listed on the California State Parks Built Environment Resource Directory (BERD).[19] A Project Inventory Site, located at 721/729 Bridgeway, is located within the Downtown Historic District Overlay in the City of Sausalito and contains the Burlwood Gallery, a designated historic resource listed on the California Historic Preservation Office state registry. The Alta Mira Hotel is immediately adjacent to the parking lots that are identified as Opportunity Site 202. As described further below, development within sites identified to be within the Downtown Historic Overlay are required to undergo City review rules and regulations required by the Sausalito Municipal Code to protect historical resources.

Under Alternative 5, Opportunity Site 52 would be anticipated to develop residential uses. There are no City of Sausalito Historic Landmarks, Potentially Eligible Historic Properties, or Properties Listed on National Register adjacent to Site 52. However, Site 52 is part of a larger parcel, the existing City of Sausalito City Hall and Library. Historically known as the Old Central School/Sausalito City Hall, the structure has a CRHR Status Code of 7N, "Needs to be reevaluated (Formerly NR Status Code 4)."[20] The City Hall and Library building is identified in the City's historic resources inventory.[21] Under Alternative 5, development is anticipated to occur only on the northern portion of the site, where the existing surface parking is located. Development of Alternative 5 is not expected to result in the demolition, refurbishment, or alteration of the existing City Hall and Library building. Site 52 is not located within or near the Sausalito Downtown Historic District.

Under Alternative 5, Opportunity Site 14 would be anticipated to develop residential uses. Alternative 5 would remove the existing fire station structure at 300 Spencer Avenue (Sausalito Fire Station No. 2), which is more than 50 years old (built approximately 1968) and is a potentially eligible historic property. The fire station has not been evaluated for the NRHP

[19] California State Parks, 2024. Built Environment Resource Directory (BERD). Resources by County: Marin County. Available: https://ohp.parks.ca.gov/?page_id=30338. Accessed: November 19, 2024.
[20] City of Sausalito, 2022. Sausalito Citywide Historic Context Statement. VerPlanck Historic Preservation Consulting. October. p. 12. Table 2.
[21] City of Sausalito, 2022. Sausalito Citywide Historic Context Statement. VerPlanck Historic Preservation Consulting. October. p. 12. Table 2.

or CRHR (California Register Status Code 7).[22] This site is not located within or near the Sausalito Downtown Historic District. There are likely buildings on identified Opportunity Sites under the proposed Project that are older than 50 years, and may qualify as a historic resource. All of the Opportunity Sites identified under the Project would be developed under Alternative 5 as well, with the addition of Site 14 for Alternative 5.

Under Alternative 5 and the Project, the development of Opportunity Site 202 would be in close proximity to the Alta Mira Hotel (Alta Mira Recovery Programs building). The Alta Mira Hotel is immediately adjacent to the parking lots that are identified as Opportunity Site 202. As described further below, development within sites identified to be within the Downtown Historic Overlay are required to undergo City review rules and regulations required by the Sausalito Municipal Code to protect historical resources. , the structure has a CRHR Status Code of 7N, "Needs to be reevaluated (Formerly NR Status Code 4)."[23] Similarly, potential vibration impacts to the would be identical under Alternative 5 as under the Project.

Furthermore, Opportunity Sites 207, 209, 39, 301, 47, and 44 included in the Project and Alternative 5 are located within archaeological sensitive zone 2. Opportunity Sites 303, 72, 211, 306, 85, 86, and 87 included in the Project and Alternative 5 are located within archaeological sensitive zone 3. Under Alternative 5, neither Site 14 nor Site 52 are within an archaeological sensitive zone.

Except for the identified historic resources in the Sausalito Downtown Historic District, there are no designated historic resources on any of the Opportunity Sites within archaeological sensitive zones 2 or 3. The following Opportunity Sites, which would be developed under both the Project and Alternative 5, are located near potentially eligible historic properties within archaeological sensitive zones 2 and 3:

- Opportunity Site 39 is near 515 Humboldt Street, the Ark—"Caprice;" and
- Opportunity Sites 44, 47, and 301 are near 116 Caledonia Street, Linsley House.

As discussed below, policies and programs included in the General Plan address the conservation and protection of historical resources, which would apply equally to the Project and Alternative 5. Policies W-5.2, CD-1.2, CD-6.1, CD-6.5 ensure protection and preservation of historical resources within the City by supporting identification of potential historical structures, protecting historic resources from sea level rise, requiring compatibility of architectural styles, and requiring project review when appropriate. Policy CD-6.2 defines the Historic Preservation Commission and its roles.

[22] California Department of Historic Preservation, 2020. California Historical Resource Status Codes. Current as of March 1, 2020. Available: https://ohp.parks.ca.gov/pages/1068/files/Resource-Status-Codes.pdf. Accessed: December 11, 2024.

[23] City of Sausalito, 2022. Sausalito Citywide Historic Context Statement. VerPlanck Historic Preservation Consulting. October. p. 12. Table 2.

The Sausalito Municipal Code contains rules and regulations that protect historical resources. Chapter 10.46 includes city review procedures for applicants seeking to demolish or modify an historical resource. Section 10.46.060 (Property and Review Requirements) prohibits the rehabilitation, alteration, demolition, removal or other changes to the exterior appearance, including paint color, of structures or sites officially deemed a historical resource without first having undergone review for a certificate of appropriateness by the Historic Preservation Commission. Section 10.46.060 also details additional findings that must be made prior to the issuance of a certificate of appropriateness. Additional findings are required for Local Historic Register Properties, properties in historic overlay districts, landscaping applications, and demolition applications. However, projects subject to Municipal Code Title 10A (ODDS) would be reviewed for consistency with Title 10A, including requirements addressing historic resources, that will be created for the ODDS, rather than being required to be consistent with these Title 10 requirements.

As the city receives development applications for subsequent development under the Project or Alternative 5, those applications will be reviewed by the City of Sausalito for compliance with the policies and programs of the General Plan and with Municipal Code standards related to the protection of historical resources. In particular all development under the Project and Alternative 5, including exterior modifications to existing structures and sites, new construction, and infill projects within the Downtown Historic Overlay Zoning District or the Residential Arks Zoning District, as well as properties on the Local, State or National Registers will require Historic Design Review in accordance with Zoning Ordinance Title 10 or Title 10A (ODDS) requirements.

Development envisioned by the Project and Alternative 5 would result in an increase in development, as well as other public improvements, that could affect known historic resources or previously unidentified or undesignated resources within the Planning Area. CEQA Guidelines Section 15064.5(b)(1) states, "Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired," which may have a significant effect on the environment. Even if a Certificate of Appropriateness is issued under Sausalito Municipal Code Section 10.46.060, any adverse change to a historical resource would be a ***potentially significant*** impact.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-18 Implement Mitigation Measure 3.4-1a and b.

> **MM 3.4-1a** Any proposed new project within the Downtown Historic Overlay Zoning District or the Residential Arks Zoning District shall be designed

in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, specifically the standards for rehabilitation and new construction within a historic district. Standards 9 and 10 for Rehabilitation state that:

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and shall be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Projects undertaken within the Downtown Historic Overlay Zoning District or the Residential Arks Zoning District shall be consistent with these standards. In addition to compliance with the above, the project developer shall ensure that any new project involving the design of a new building shall not have a significant impact on the Downtown Historic Overlay Zoning District's or the Residential Arks Zoning District's contributing resources or its features and characteristics. The City of Sausalito Community Development Director, or the Historic Preservation Commission, as appropriate per the requirements of Chapter 10.46, Historic Preservation, of the City Code, shall review any proposed project's site plan and design to ensure its compatibility with the SOI Standards and the adopted standards of the Downtown Historic Overlay Zoning District or the Residential Arks Zoning District.

MM 3.4-1b Prior to any construction activities within or adjacent to historic resources in the City, including sites listed or eligible for the National Register of Historic Places, sites listed on or eligible for the California Register of Historic Resources Places, including the Downtown Historic District, contributors to the Downtown Historic District, landmarks, and sites listed on the City's Inventory of Noteworthy Structures, a qualified historian or architectural historian shall survey adjacent parcels for potential historic resources on those parcels. The survey shall include archival research, field inspection, and consultation with local historical societies or preservation organizations. Based on the survey

findings, the project proponent shall develop a Historic Resource Protection Plan (HRPP) that outlines specific measures for the avoidance, protection, and documentation of those identified historic resources. If resources adjacent to the proposed project site are determined to be eligible for listing on the Historic Register, or are already registered as such, the HRPP shall include additional mitigation measures, such as avoidance, preservation in place, or data recovery to ensure that no significant historic resources are inadvertently damaged or destroyed during construction. Measures identified in the HRPP shall reflect the requirements identified in the Secretary of the Interior's Standards for the Treatment of Historic Properties. The HRPP shall be prepared by a qualified historian or architectural historian, and subject to review and approval by the City of Sausalito Community Development Director or the Historic Preservation Commission, as appropriate.

Level of Significance After Mitigation
Less than Significant

With the implementation of Mitigation Measure 4.5-18, compliance with the Secretary of the Interior's Rehabilitation Standards would reduce anticipated impacts on historic resources, including the Downtown Historic District, landmark sites, sites on or eligible for the National Register, sites on or eligible for the California Register, and the Residential Arks Zoning District, through design standards and historic district plan and design guidelines guidance. This mitigation would apply to both the Project and Alternative 5. In addition, implementation of Mitigation Measure 4.5-18 would ensure that potentially significant impacts require additional mitigation measures to ensure that no significant historic resources are inadvertently damaged or destroyed as a result of direct or indirect effects by project implementation in historically sensitive areas. Impacts from Alternative 5 would be slightly worse than those under the Project because it would remove a building that is more than 50 years old (Fire Station on Site 14) and would be adjacent to the City Hall and Library building, which may be eligible for listing as a historic resource. Therefore, with implementation of mitigation, the impact would be ***less than significant*** for both the Project and Alternative 5.

Impact 4.5-19	**Implementation of Alternative 5 could result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. (See Impact 3.4-2 for Project impacts related to this topic)**

Known archaeological resource sites are located mostly in southern areas of the city near the waterfront Based on a review of information available at the NWIC, only a small portion of the Planning Area has been previously surveyed for archaeological resources. Therefore,

it is expected that additional undiscovered sites exist in the Planning Area and could be discovered through implementation of the Project or Alternative 5. Development accommodated under the Project and Alternative 5 would result in additional residential development throughout the City, including along the waterfront areas.

Potential for additional archaeological sites to be present within the City of Sausalito exists, but varies by location. Prehistoric habitation sites, such as those known to be present within the City, tend to be situated along creeks and other areas with a reliable water supply, whereas task-specific sites or resource procurement sites can be situated in almost any environment conducive to human activity. Buried prehistoric archaeological sites tend to be found on Holocene-age landforms, particularly alluvial fans, floodplains, and areas along rivers and streams. As such, within the Sausalito Planning Area, the waterfront has the greatest potential for buried prehistoric archaeological resources to be present.

Policies and programs included in the General Plan, and applicable to the Project and Alternative 5, address potential impacts to archaeological resources. Policy EQ-1.6 requires the city to conserve archaeological resources through respect and sensitivity to the native and early history of the Southern Marin area. Program EQ 1.6.2 requires new development to conduct an NWIC search to determine whether a project site is in a zone of archaeological and/or historical sensitivity. Program EQ-1.6.3 requires an archaeological survey on properties near known archaeological sites prior to excavation. Program EQ-1.6.4 outlines the procedure for accidental discovery of an archaeological resource, including the halting of construction activity until the site is examined by a city-approved Archaeologist.

As the City receives individual development applications for subsequent development under the Project and Alternative 5, those applications will be reviewed by the City of Sausalito for compliance with the policies and programs of the General Plan that are related to archaeological resources. In particular, new development would be required to conduct a records search with the NWIC to determine the archaeological sensitivity of the site. If required, an archaeological survey of the site would be conducted and/or accidental discovery procedures for archaeological resources would be required.

In conclusion, development envisioned by both the Project and Alternative 5 could result in new development, as well as other public improvements, that could affect known or previously unidentified archaeological resources within the Planning Area. The potential to encounter such resources would be similar for both the Project and Alternative 5. However, compliance with Housing Element and General Plan policies and programs would ensure that future development projects are appropriately reviewed and designed in terms of potential impacts to archaeological resources. Consistent with the General Plan policies, individual discretionary development projects associated with the Project and Alternative 5 would be required to undergo project-specific archaeological surveys, which may require additional site specific or project specific measures to reduce any potential impacts.

However, unanticipated discovery of archaeological resources could occur during construction activities. Therefore, the impact is ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-19 Implement Mitigation Measures 3.4-2a and b.

MM 3.4-2 a Conduct Cultural Resources and Tribal Cultural Resources Sensitivity and Awareness Training Program Before Ground Disturbing Activities. A tribal cultural resources awareness brochure and training program for all personnel involved in project implementation shall be developed in coordination with interested Native American Tribes. The brochure shall be distributed and the training will be conducted by Native American representatives, or tribal monitors from culturally affiliated Native American Tribes, before any stages of project implementation and construction activities begin on the project site. The training may be done in coordination with the project archaeologist.

The program will include relevant information regarding sensitive tribal cultural resources, applicable regulations and protocols for avoidance, and consequences of violating state laws and regulations. The program will describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and will outline what to do and whom to contact if any potential tribal cultural resources or archaeological resources are encountered. The program will underscore the requirement for confidentiality and culturally appropriate treatment of any find with cultural significance to Native Americans' tribal values. All operators of ground disturbing equipment shall receive the training and sign a form that acknowledges receipt of the training.

MM 3.4-2b Implement Avoidance and Minimization Measures to Avoid Significant Impacts and Procedures to Evaluate Resources. If cultural resources or tribal cultural resources (such as structural features, unusual amounts of bone or shell, artifacts, or human remains) are encountered at the project site during construction, work shall be suspended within 100 feet of the find (based on the apparent distribution of cultural materials), and the construction contractor shall immediately notify the project's City representative. Avoidance

and preservation in place is the preferred manner of mitigating impacts on cultural resources and tribal cultural resources. This may be accomplished, by several alternative means, including those listed below.

- Construction will be planned to avoid tribal cultural resources, archaeological sites, and/or other cultural resources; cultural resources will be incorporated within parks, green space, or other open space; archaeological resources will be covered; a cultural resource will be deeded to a permanent conservation easement; or the project will use other preservation and protection methods agreeable to the consulting parties and regulatory authorities with jurisdiction over the activity.

- Recommendations for avoidance of cultural resources and tribal cultural resources will be reviewed by the City representative, interested culturally affiliated Native American Tribes, and other appropriate agencies in light of factors such as costs, logistics, feasibility, design, technology, and social, cultural, and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project site to avoid cultural resources or tribal cultural resources, modification of the design to eliminate or reduce impacts on cultural resources or tribal cultural resources, or modification or realignment to avoid highly significant features within a cultural resource or tribal cultural resource.

- Native American representatives from interested culturally affiliated Native American Tribes will be invited to review and comment on these analyses and shall have the opportunity to meet with the City representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate avoidance and design alternatives can be identified.

- If the discovered cultural resource or tribal cultural resource can be avoided, the construction contractor(s) will install protective fencing outside the site boundary, including a 100-foot buffer area, before construction restarts. The boundary of a cultural resource or a tribal cultural resource will be determined in consultation with interested culturally affiliated Native American tribes and tribes will be invited to monitor the installation of fencing. Use of temporary and permanent

forms of protective fencing will be determined in consultation with Native American representatives from interested culturally affiliated Native American tribes.

- The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an "Environmentally Sensitive Area."

If a cultural resource or a tribal cultural resource cannot be avoided, the following performance standard shall be met before the continuance of construction and associated activities that may result in damage to or destruction of cultural resources or tribal cultural resources:

- Each resource will be evaluated for California Register of Historical Resources eligibility through application of established eligibility criteria (California Code of Regulations Title 14, Section 15064.636), in consultation with consulting Native American Tribes, as applicable.

If a cultural resource or a tribal cultural resource is determined to be eligible for listing in the California Register, the City will avoid damaging effects on the resource in accordance with PRC Section 21084.3. The City shall coordinate the investigation of the find with a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology) approved by the City and with interested culturally affiliated Native American tribes that respond to the City's invitation. As part of the site investigation and resource assessment, the City and the archaeologist shall consult with interested culturally affiliated Native American tribes to assess the significance of the find, make recommendations for further evaluation and treatment as necessary, and provide proper management recommendations should potential impacts on the resources be determined by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City representative by the qualified archaeologist. These recommendations will be documented in the project record. For any recommendations made by interested culturally affiliated Native American tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

Native American representatives from interested culturally affiliated Native American tribes and the City representative will also consult to develop measures for long-term management of any discovered tribal cultural resources. Consultation will be limited to actions consistent with the jurisdiction of the City and taking into account ownership of the subject property. To the extent that the City has jurisdiction, routine operation and maintenance within tribal cultural resources retaining tribal cultural integrity shall be consistent with the avoidance and minimization standards identified in this mitigation measure.

If the City determines that the project may cause a significant impact on a tribal cultural resource, and measures are not otherwise identified in the consultation process, the following are examples of mitigation capable of avoiding or substantially lessening potential significant impacts on a tribal cultural resource or alternatives that would avoid significant impacts on the resource. These measures may be considered to avoid or minimize significant adverse impacts and constitute the standard by which an impact conclusion of less than significant may be reached:

- Avoid and preserve resources in place, including but not limited to planning construction to avoid the resources and protect the cultural and natural context, or planning green space, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria.

- Treat the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including but not limited to the following:

    - Protect the cultural character and integrity of the resource.

    - Protect the traditional use of the resource.

    - Protect the confidentiality of the resource.

    - Establish permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places.

- Protect the resource.

Level of Significance After Mitigation
Significant and Unavoidable

Implementation of Mitigation Measure 4.5-19 would reduce potential impacts of the Project and Alternative 5 on inadvertently discovered archaeological resources by ensuring that any resources inadvertently discovered during construction would be evaluated for significance and treated appropriately in consultation with a culturally affiliated Native American tribe. However, and while this is not anticipated, there is a possibility that construction activities undertaken as part of the Project or Alternative 5 could inadvertently damage or destroy unanticipated subsurface resources, the destruction of which would be a ***significant and unavoidable*** impact for both the Project and Alternative 5.

Impact 4.5-20 Implementation of Alternative 5 could result in disturbance of human remains, including those interred outside of formal cemeteries. (See Impact 3.4-3 for Project impacts related to this topic)

Excavation and construction activities associated with the Project and Alternative 5 may uncover human remains that may not be marked in formal burial locations. Therefore, as future development and infrastructure projects are proposed under the Project and Alternative 5, and reviewed by the city, each project would be evaluated for conformance with the General Plan, Sausalito Municipal Code, and other applicable State regulations. Under CEQA, human remains are protected under the definition of archaeological materials as being "any evidence of human activity."

Public Resources Code Section 5097 has specific stop-work and notification procedures to follow when Native American human remains are inadvertently discovered during excavation and construction activities. This requirement applies to all construction projects within the Sausalito Planning Area.

The General Plan, includes policies and programs intended to conserve and reduce impacts to archaeological resources, including human remains, and those policies and programs would apply equally to the Project and Alternative 5. Policy EQ-1.6 requires the City to conserve archaeological resources through respect and sensitivity to the native and early history of the Southern Marin area. Program EQ-1.6.4 outlines the procedure for accidental discovery of an archaeological resource, including halting construction activity until the site is examined by a city-approved Archaeologist.

Implementation of policies and programs in the General Plan, as well as compliance with adopted state, federal and local regulations for the protection of human remains, would ensure that future development associated with the Project and Alternative 5 would not result in significant adverse effects to human remains. However, the inadvertent discovery

of human remains could occur during construction activities and human remains could be disturbed. Therefore, impacts would be considered ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-20 Implement Mitigation Measure 3.4-3.

> **MM 3.4-3** Implement Procedures in the Event of Inadvertent Discovery of Human Remains. If an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, the following performance standards shall be met before implementing or continuing actions such as construction that may result in damage to or destruction of human remains. In accordance with the California Health and Safety Code (HSC), if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the remains and notify the Marin County Coroner and a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology) to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (HSC Section 7050.5[b]).
>
> If the human remains are of historic age and are determined by the Marin County Coroner to be not of Native American origin, the City will follow the provisions of HSC Section 7000 et seq. regarding the disinterment and removal of non–Native American human remains.
>
> If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC Section 7050[c]). After the coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant, in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in Public Resources Code Section 5097.9 et seq.

Level of Significance After Mitigation
Significant and Unavoidable

Implementation of Mitigation Measure 4.5-20 would reduce the potential impacts of the Project and Alternative 5 on inadvertently discovered human remains by determining if the remains are Native American in origin and, if determined to be Native American, a Most Likely Descendant is assigned to determine the treatment. However, and while this is not anticipated, there is a possibility that inadvertent damage to or destruction of unanticipated subsurface human remains, particularly within the identified archaeologically sensitive zones, could occur during construction activities. The impact on human remains would be similar under Alternative 5 as the Project. Due to the possibility of damage or destruction to human remains, the impact would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-21	**Implementation of Alternative 5 could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k). (See Impact 3.4-4 for Project impacts related to this topic)**

A NAHC Sacred Lands File search identified recorded tribal cultural resources within the Planning Area (see Appendix C). A records search conducted at the NWIC identified five listed prehistoric sites that meet the definition of a tribal cultural resource within the Planning Area. It is always possible that subsurface excavation activities may encounter previously undiscovered tribal cultural resources. Therefore, any unidentified resources could be adversely affected by development under the Project or Alternative 5 and create a potentially significant impact.

While neither the Project nor Alternative 5 directly propose any adverse changes to any recorded tribal cultural resources, future development allowed under the Project and Alternative 5 could affect known or previously unidentified resources. In addition, the potential for additional undiscovered eligible tribal cultural resources to be present within the Sausalito Planning Area exists but varies by location. As with prehistoric archaeological resources, the waterfront has the greatest potential for buried tribal cultural resources to be present (see Figure 3.4-2). Under Alternative 5, neither Site 14 nor Site 52 are within an identified archaeological sensitive zone.

The General Plan includes policies and programs intended to conserve and reduce impacts to archaeological resources, which can include tribal cultural resources. Policy EQ-1.6 requires the city to be respectful and sensitive to the native and early history of the Southern Marin area. Program EQ 1.6.2 requires new development to conduct NWIC searches to determine whether a project site is in a zone of archaeological and/or historical sensitivity. Program EQ-1.6.3 requires archaeological surveys on properties near known archaeological

sites prior to excavation. Program EQ-1.6.4 outlines the procedure for accidental discovery of an archaeological resource, including halting construction activity until the site is examined by a city-approved Archaeologist.

Policy CD-6.6 Tribal Consultation with Federated Indians of Graton Rancheria (FIGR) of the General Plan, includes specific programs and protocols to define the consultation process for future projects, including criteria and thresholds for FIGR project review and monitoring.

Implementation of policies and programs in the General Plan, as well as compliance with adopted state, federal and local regulations for the protection of tribal cultural resources, would ensure that future development associated with the Project and Alternative 5 would not result in significant adverse effects to known tribal cultural resources. However, the inadvertent discovery of tribal cultural resources could occur during construction activities and damage to, or destruction of, those resources could occur. Impacts under the Project and Alternative 5 would be similar. Therefore, impacts would be considered ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-21 Implement Mitigation Measures 3.4-2a and 3.4-2b.

> **MM 3.4-2 a** Conduct Cultural Resources and Tribal Cultural Resources Sensitivity and Awareness Training Program Before Ground Disturbing Activities. A tribal cultural resources awareness brochure and training program for all personnel involved in project implementation shall be developed in coordination with interested Native American Tribes. The brochure shall be distributed and the training will be conducted by Native American representatives, or tribal monitors from culturally affiliated Native American Tribes, before any stages of project implementation and construction activities begin on the project site. The training may be done in coordination with the project archaeologist.
>
> The program will include relevant information regarding sensitive tribal cultural resources, applicable regulations and protocols for avoidance, and consequences of violating state laws and regulations. The program will describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and will outline what to do and whom to contact if any potential tribal cultural resources or archaeological resources are encountered. The program will underscore the requirement for

confidentiality and culturally appropriate treatment of any find with cultural significance to Native Americans' tribal values. All operators of ground disturbing equipment shall receive the training and sign a form that acknowledges receipt of the training.

MM 3.4-2b Implement Avoidance and Minimization Measures to Avoid Significant Impacts and Procedures to Evaluate Resources. If cultural resources or tribal cultural resources (such as structural features, unusual amounts of bone or shell, artifacts, or human remains) are encountered at the project site during construction, work shall be suspended within 100 feet of the find (based on the apparent distribution of cultural materials), and the construction contractor shall immediately notify the project's City representative. Avoidance and preservation in place is the preferred manner of mitigating impacts on cultural resources and tribal cultural resources. This may be accomplished, by several alternative means, including those listed below.

- Construction will be planned to avoid tribal cultural resources, archaeological sites, and/or other cultural resources; cultural resources will be incorporated within parks, green space, or other open space; archaeological resources will be covered; a cultural resource will be deeded to a permanent conservation easement; or the project will use other preservation and protection methods agreeable to the consulting parties and regulatory authorities with jurisdiction over the activity.

- Recommendations for avoidance of cultural resources and tribal cultural resources will be reviewed by the City representative, interested culturally affiliated Native American Tribes, and other appropriate agencies in light of factors such as costs, logistics, feasibility, design, technology, and social, cultural, and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project site to avoid cultural resources or tribal cultural resources, modification of the design to eliminate or reduce impacts on cultural resources or tribal cultural resources, or modification or realignment to avoid highly significant features within a cultural resource or tribal cultural resource.

- Native American representatives from interested culturally affiliated Native American Tribes will be invited to review and comment on these

analyses and shall have the opportunity to meet with the City representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate avoidance and design alternatives can be identified.

- If the discovered cultural resource or tribal cultural resource can be avoided, the construction contractor(s) will install protective fencing outside the site boundary, including a 100-foot buffer area, before construction restarts. The boundary of a cultural resource or a tribal cultural resource will be determined in consultation with interested culturally affiliated Native American tribes and tribes will be invited to monitor the installation of fencing. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American representatives from interested culturally affiliated Native American tribes.

- The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an "Environmentally Sensitive Area."

If a cultural resource or a tribal cultural resource cannot be avoided, the following performance standard shall be met before the continuance of construction and associated activities that may result in damage to or destruction of cultural resources or tribal cultural resources:

- Each resource will be evaluated for California Register of Historical Resources eligibility through application of established eligibility criteria (California Code of Regulations Title 14, Section 15064.636), in consultation with consulting Native American Tribes, as applicable.

If a cultural resource or a tribal cultural resource is determined to be eligible for listing in the California Register, the City will avoid damaging effects on the resource in accordance with PRC Section 21084.3. The City shall coordinate the investigation of the find with a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology) approved by the City and with interested culturally affiliated Native American tribes that respond to the City's invitation. As part of the site investigation and resource assessment, the City and the archaeologist shall consult with

interested culturally affiliated Native American tribes to assess the significance of the find, make recommendations for further evaluation and treatment as necessary, and provide proper management recommendations should potential impacts on the resources be determined by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City representative by the qualified archaeologist. These recommendations will be documented in the project record. For any recommendations made by interested culturally affiliated Native American tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

Native American representatives from interested culturally affiliated Native American tribes and the City representative will also consult to develop measures for long-term management of any discovered tribal cultural resources. Consultation will be limited to actions consistent with the jurisdiction of the City and taking into account ownership of the subject property. To the extent that the City has jurisdiction, routine operation and maintenance within tribal cultural resources retaining tribal cultural integrity shall be consistent with the avoidance and minimization standards identified in this mitigation measure.

If the City determines that the project may cause a significant impact on a tribal cultural resource, and measures are not otherwise identified in the consultation process, the following are examples of mitigation capable of avoiding or substantially lessening potential significant impacts on a tribal cultural resource or alternatives that would avoid significant impacts on the resource. These measures may be considered to avoid or minimize significant adverse impacts and constitute the standard by which an impact conclusion of less than significant may be reached:

- Avoid and preserve resources in place, including but not limited to planning construction to avoid the resources and protect the cultural and natural context, or planning green space, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria.

- Treat the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including but not limited to the following:
    - Protect the cultural character and integrity of the resource.
    - Protect the traditional use of the resource.
    - Protect the confidentiality of the resource.
    - Establish permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places.
    - Protect the resource.

Level of Significance After Mitigation
Significant and Unavoidable.

Implementation of Mitigation Measure 4.5-21 would reduce potential impacts of the Project and Alternative 5 on inadvertently discovered tribal cultural resources by ensuring that any resources inadvertently discovered during construction would be evaluated for significance and treated appropriately in consultation with a culturally affiliated Native American tribe. However, and while this is not anticipated, there is a possibility that inadvertent damage to or destruction of unanticipated subsurface tribal cultural resources could occur during construction activities, the impact of which would be similar under Alternative 5 as under the Project. Therefore, impacts to tribal cultural resources would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-22	**Implementation of Alternative 5 could cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (See Impact 3.4-5 for Project impacts related to this topic)**

A letter was sent to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the project area, which includes Sites 14 and 52 because they are within the city limits. A response was received on December 29, 2022 indicating the search returned positive results for tribal cultural resources in the Planning Area, and recommended contacting tribal representatives from the Federated Indians of Graton Rancheria for additional information.

In accordance with requirements promulgated by SB 18 and AB 52, the City of Sausalito notified the Wuksache Indian Tribe/Eshom Valley Band, Guidiville Indian Rancheria, and the Federated Indians of Graton Rancheria of the Project and invited the tribes to participate in consultation (see Appendix C). The letters were sent to the Native American Tribes via certified mail on July 28, 2023. A follow-up email with the same notification was sent to the tribes on July 31, 2023.No response was received by the Wuksache Indian Tribe/Eshom Valley Band or the Guidiville Indian Rancheria. The Federated Indians of Graton Rancheria submitted a request to consult with the City on August 15, 2023, and the City coordinated and attended a consultation meeting via Zoom with the Tribe on November 9, 2023. Following the consultation meeting, the City sent follow-up communication and information to the Tribe, as requested, on November 13, 2023 and requested input from the Tribe. Prior to the release of the Draft EIR, the City provided additional information to the Tribe on January 4, 2024 and again invited the Tribe's feedback.

At this time, the City of Sausalito, in its capacity as Lead Agency, has not identified or determined any known tribal cultural resources pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 that will be adversely impacted by the Project or Alternative 5. Nonetheless, as described under Impact 4.5-21, future development permitted under the Project and Alternative 5 could affect previously unidentified tribal cultural resources.

As discussed under Impact 4.5-21, the General Plan includes policies and programs intended to reduce impacts to and conserve archaeological resources, which can include tribal cultural resources, such as Policy EQ-1.6 and Programs EQ 1.6.2 through EQ-1.6.4. Policy CD-6.6 Tribal Consultation with Federated Indians of Graton Rancheria, and the subsequent programs under Policy CD-6.6 require proactive consultation with the Tribe under AB-52 for potential disturbance, recovery, and preservation of tribal cultural resources, as well as when amending the General Plan, adopting or amending a Specific Plan, designating open space, significant development projects, review of historical tributes through public names and monuments, and at any other time as required by State Law. However, inadvertent discovery of tribal cultural resources could occur during construction of the Project or Alternative 5, and the impact would be ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-22 Implement Mitigation Measures 3.4-2a and 3.4-2b.

Level of Significance After Mitigation
Significant and Unavoidable

Implementation of Mitigation Measure 4.5-22 would reduce potential impacts of the Project and Alternative 5 on inadvertently discovered archaeological resources by ensuring that any resources inadvertently discovered during construction of future projects would be evaluated for significance and treated appropriately in consultation with a culturally affiliated Native American tribe. However, and while this is not anticipated, there is a possibility that inadvertent damage to or destruction of unanticipated subsurface tribal cultural resources determined to be to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 could occur during construction activities associated with the Project and Alternative 5. Impacts would be similar under Alternative 5 as under the Project. Therefore, impacts to tribal cultural resources would be ***significant and unavoidable*** under both the Project and Alternative 5.

Impact 4.5-23	**Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impacts with respect to historic, cultural, or tribal cultural resources. (See Impact 3.4-6 for cumulative plus Project impacts related to this topic)**

This analysis evaluates whether the impacts of Alternative 5, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to historic, cultural, and tribal cultural resources. This analysis then considers whether incremental contribution of impacts associated with the implementation of Alternative 5 would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact.

The geographic context for this analysis includes the Sausalito Planning Area, Marin City, Tam Valley, Mill Valley, and other adjacent unincorporated areas. Past, present, and future development projects contribute to impacts related to cultural or tribal cultural resources.

Cumulative development within unincorporated Marin County is identified as less than significant in the Marin Countywide Plan Update Final EIR.[24] The Marin Countywide Plan would increase the amount of lands designated as Open Space due to the acquisition of land by the GGNRA. Within the community of Marin City, the Marin Countywide Plan identified an additional 149 to 256 housing units and the potential for additional non-residential development. Within Tam Valley, approximately 235 acres of residential land would be changed to Open Space. The Marin Countywide Plan identified an additional 177 to 305 housing units and the potential for additional non-residential development within Tam Valley. Cumulative development within Mill Valley is identified in the Mill Valley 2040 General Plan Final EIR.[25] The Mill Valley General Plan identified an additional 146 new dwelling units

[24] County of Marin. Community Development Department. 2007. Marin Countywide Plan Update Final Environmental Impact Report. November.

[25] City of Mill Valley, Planning and Building Department. 2013. Mill Valley 2040 General Plan Final EIR. October.

within the residential-zoned sites and an additional 239 dwelling units within the commercial-zoned sites. The 2040 Mill Valley General Plan identifies less than significant cumulative impacts and calls for preserving and protecting potential and listed historic and archaeological resources, working with the Mill Valley Historical Society to develop a comprehensive inventory of potential historic and archaeological resources, protecting the value of historic and cultural resources, and promoting education about historic preservation. Cumulative projects within Mill Valley and unincorporated Marin County, including Marin City and Tam Valley, would be required to comply with applicable policies and programs and adhere to the rules and regulations in the Marin County Municipal Code and Mill Valley Municipal Code that protect cultural and tribal cultural resources. Cumulative projects would be required to comply federal, State, and local policies that protect cultural and tribal cultural resources, including the provisions of SB 18 and AB 52, Section 15064.5 of the CEQA Guidelines, and Sections 5024.1 and 5097 of the Public Resources Code. Accordingly, because cumulative development would be required to comply with long-term planning documents, and regulatory agency guidance establishing policies (including, but not limited to, evaluation requirements and inadvertent discovery procedures). However, the inadvertent discovery of cultural or tribal cultural resources could occur during construction activities, and the impact would be ***potentially significant***.

As discussed under Impacts 4.5-18 through 4.5-22, as the City receives development applications for subsequent development under Alternative 5, those applications will be reviewed by the City of Sausalito for compliance with the policies and programs of the General Plan, the provisions of SB 18 and AB 52, the Sausalito Municipal Code historic preservation regulations, and other relevant federal, State, and local regulations that protect historic, cultural, and tribal cultural resources, including Section 15064.5 of the CEQA Guidelines and Sections 5024.1 and 5097 of the Public Resources Code. However, the inadvertent discovery of cultural or tribal cultural resources could occur during construction activities associated with Alternative 5, or damage or demolition of historic structures could occur, and the Project's contribution would be considerable. Therefore, the cumulative impact would be ***potentially significant,*** as it would be under the Project.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-23 Implement Mitigation Measures 3.4-1(a) and (b), Mitigation Measures 3.4-2 (a) and (b), and Mitigation Measure 3.4-3.

Level of Significance After Mitigation
Significant and Unavoidable

Implementation of Mitigation Measure 4.5-23 would reduce potential impacts on known historic resources by requiring that projects avoid damaging or destroying such resources.

However, and while this is not anticipated, there is a possibility that the destruction of a historic resource could occur as a result of Alternative 5 implementation, and such an impact would be significant and unavoidable as the resource could not be recovered.

Implementation of Mitigation Measure 4.5-23 would reduce potential impacts of the proposed project on inadvertently discovered archaeological resources, cultural resources, and tribal cultural resources by ensuring that any resources inadvertently discovered during construction would be evaluated for significance and treated appropriately in consultation with a culturally affiliated Native American tribe.

Further, implementation of Mitigation Measure 4.5-23 would reduce the potential impacts of Alternative 5 on inadvertently discovered human remains by determining if the remains are Native American in origin and, if determined to be Native American, a Most Likely Descendant is assigned to determine the appropriate treatment. However, and while this is not anticipated, there is a possibility that inadvertent damage to or destruction of unanticipated subsurface tribal cultural resources determined to be to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 could occur during construction activities, the impacts of which would be ***significant and unavoidable,*** as it would be under the Project.

Energy

Information regarding the existing setting, regulatory setting, and thresholds of significance for Energy impacts can be found on pages 3.5-1 through 3.5-17 in Section 3.5, Energy, of the Draft EIR.

Impact 4.5-24	**Implementation of Alternative 5 could result in the wasteful, inefficient, or unnecessary consumption of energy during project construction or operation, including transportation energy. (See Impact 3.5-1 for Project impacts related to this topic)**

Implementation of both the Project and Alternative 5 would utilize energy resources during construction and operational activities of individual projects pursued under the Project and Alternative 5. Energy resources that would be potentially impacted include electricity, natural gas, and petroleum-based fuel supplies and distribution systems.

Construction Energy Usage

Construction activities associated with the Project and Alternative 5 would consume energy in the form of petroleum fuel for heavy equipment, as well as from worker trips and material delivery trips to the construction sites. Temporary electrical grid power may also be provided to construction sites. It is too speculative at this time to calculate energy usage associated with construction activities because the details regarding future construction activities are not known, including phasing, construction duration, and construction equipment. It should be noted that future development projects may require individual project-level environmental review that tiers off of this Program EIR to assess potential construction-related energy consumption impacts.

The Project would develop up to 1,147 residential units, while Alternative 5 would develop up to 1,133 residential units. Although fewer units would be developed under Alternative 5 as compared to the Project, two additional sites, Site 14 and Site 52, would be developed. It is likely that the energy used during construction of Alternative 5 would be similar to that used under the Project.

New development pursued under the Project and Alternative 5 would be subject to energy conservation requirements in the California Energy Code (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and CALGreen (Title 24, Part 11 of the California Code of Regulations). The City of Sausalito also requires submittal of a CALGreen checklist for projects subject to design review to ensure energy conservation.

The Sausalito Municipal Code contains rules and regulations to reduce energy usage during construction. Specifically, Chapter 3.36 establishes construction traffic road fees, which would indirectly reduce construction-related traffic, by creating additional specifical financial

disincentives of generating construction traffic beyond what is needed. Reduced construction-related traffic would reduce overall construction-related energy usage during construction.

Based on standards for new construction established by the State and the Bay Area Air Quality Management District (BAAQMD), and adherence to the development standards in the Sausalito Municipal Code, activities associated with implementation of both the Project and Alternative 5 would not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, implementation of the Project and Alternative 5 would have a ***less-than-significant*** impact on construction energy consumption.

Operational Energy Usage

Implementation of Alternative 5 may result in development of up to 1,133 new residential units and 5,171 new square feet of nonresidential uses, which would be 14 units fewer than under the Project. Operation of the potential new development in the city, under both the Project and Alternative 5, would consume natural gas and electricity for building heating and power, lighting, and water conveyance, among other operational requirements. The electrical consumption and natural gas usage associated with the potential development have been calculated in the CalEEMod model, which found that the potential development under Alternative 5 would consume 4,732,135 kWh of electricity per year and 29,426,709 kilo-British Thermal Units (kBTUs) of natural gas per year. This is slightly less compared to the 4,790,074 kWh of electricity consumed per year and 29,789,912 kilo-British Thermal Units (kBTUs) of natural gas consumed per year under the Project.

In addition, the 2022 California Code of Regulations Title 24 Part 6 standards require all homes built in California to have zero-net-energy use, which is achieved through energy-efficiency measures as well required rooftop solar photovoltaic systems. It is anticipated that the future development within the city would be designed and built to minimize electricity and natural gas usage.

The Vehicle Miles Traveled (VMT) created from implementation of Alternative 5 has been analyzed in Impact 4.5-52 which found that Alternative 5, units at Sites 14 and 52 are projected to produce somewhat lower VMT per capita than units at Site 84. This means that shifting any number of units from Site 84 to Sites 14 and/or 52 under Alternative 5 would reduce VMT levels as compared to the Project. If the number of units on Site 84 is reduced to zero and Sites 14 and 52 are each allocated 25 added units, citywide home-based VMT is estimated to be reduced by about 1,130 miles under Alternative 5 as compared to the Project. This could be considered a slight reduction in VMT impacts compared to the Project, though when considered at the citywide level, the decrease would not result in a measurable change to Sausalito's VMT per Capita. With respect to the effects associated with increasing the proportion of affordable units on Sites 303 and 202 under Alternative 5, per-capita VMT levels at these sites would be expected to decrease slightly as compared to the Project given

the relationship between affordable housing and lower levels of VMT production, though again these changes are not anticipated to result in measurable changes to VMT per capita at the citywide level.

Due to the passage of the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which removed the waiver allowing California to set its own vehicle emissions standard, the State is now reliant on the EPA to set vehicle efficiency standards. As such, the most recent national miles per gallon rate of 22.3 miles per gallon for light-duty vehicles has been utilized from Bureau of Transportation Statistics, resulting in the estimated consumption of an additional 485,081 gallons of petroleum fuel per year with implementation of the Project.[26] Alternative 5 would result in the consumption of an additional 479,354 gallons of petroleum fuel per year, which would be less than under the Project. In September 2020, Governor Gavin Newsom issued Executive order N-79-20, which requires sales of all new passenger vehicles to be zero-emission by 2035 and additional measures to eliminate harmful emissions from the transportation sector, indicating that further reductions in vehicle emissions, and therefore fuel consumption, will be forthcoming through buildout of both the Project and Alternative 5.

The Circulation and Parking Element of the General Plan contains several policies and programs that assist in reducing petroleum fuel use, and that would be applicable to both the Project and Alternative 5. Policy CP-3.1 encourages the maintenance of a safe, efficient, and reliable bus service. Policy CP-3.2 seeks to promote alternative transportation modes to reduce the reliance on private automobiles. Policy CP-3.3 expands the first- and last-mile programs to connect transit to destinations and supports park and ride areas within the city. Policy CP-5.1 calls for the City to implement and maintain bicycle infrastructure in Sausalito according to the Bicycle Master Plan. Policy CP-5.7 seeks to maintain, improve, and extend pedestrian trails. Policy CP-5.11 requires that new development and substantial remodels in the Marinship give special attention to the establishment and enhancement of pedestrian and bicycle pathways. Therefore, potential new development that may occur from implementation of the Project or Alternative 5 would be designed and built to minimize transportation energy through the promotion of the use of alternative transportation modes.

In addition, all new development in the city would be required to meet State energy efficiency regulations that include Title 24 Part 6 building energy efficiency standards that require new residential uses to meet a net zero energy use standard, that is met through installation of rooftop solar PV systems, enhanced insulation and energy-efficient appliances. The Title 24 Part 6 requirements also require nonresidential buildings to be designed for increased energy-efficiency standards. Other State energy-efficiency regulations include SB 100 that requires 100 percent of retail sales of electricity to be generated from zero-carbon emission

[26] Bureau of Transportation Statistics. 2023. Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Website: https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles. Accessed August 1, 2024.

sources by 2045 and Executive Order N-79-20 that requires 100 percent of new passenger vehicles sold in California to be zero-emissions by 2035.

Based on compliance with the City's General Plan policies and programs, adherence to the development standards in the Sausalito Municipal Code, and compliance with State regulations, operations associated with implementation of either the Project or Alternative 5 would not result in wasteful, inefficient, or unnecessary energy consumption. Construction energy usage would be similar under Alternative 5 as under the Project and operational energy usage would be slightly less under Alternative 5 compared to the Project. These policies and programs would minimize demands for energy resources and ensure their efficient use. Therefore, implementation of both the Project and Alternative 5 would not result in the wasteful, inefficient use, or unnecessary consumption of energy. Therefore, implementation of the Project and Alternative 5 would have a ***less-than-significant impact***.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-25	**Implementation of Alternative 5 would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. (See Impact 3.5-2 for Project impacts related to this topic)**

Implementation of the Project and Alternative 5 would result in an increase in new residential and nonresidential uses. Potential new development that may occur from the Project and Alternative 5 would be required to comply with the City's General Plan policies and programs and adherence to the development standards within Titles 8, 9 and 10 in the Sausalito Municipal Code related to energy consumption and conservation.

The City of Sausalito adopted its CAP in June 2015, which addresses potential impacts related to climate change through the implementation of several energy efficiency measures that are listed in the Regulatory Setting of Section 3.5, Energy. All future development associated with the Project and Alternative 5 would be required to implement all applicable energy-efficiency measures listed in the CAP. In addition, all future development would be required to adhere to the Sausalito Municipal Code, which contains rules and regulations regarding energy efficiency. Chapter 8.18 adopts the 2019 California Energy Code, Title 24, Part 6, and incorporates the code into the Sausalito Municipal Code. Chapter 8.52 contains regulations to support water conservation. These measures help to reduce energy consumption. Chapter 3.36 establishes construction traffic road fees, which is designed to defray the cost

of road repairs related to damage caused by construction vehicles, and which would also reduce construction-related traffic. Reduced construction-related traffic would reduce overall construction-related energy usage during construction.

In addition, the Project and Alternative 5 would be required to comply with applicable State or regional plans for renewable energy or energy efficiency, that include Plan Bay Area 2050, BAAQMD 2017 Clean Air Plan, 2007 State Alternative Fuels Plan, including Executive Order N-79-20 that requires 100 percent of new passenger vehicles sold in California to be zero-emissions by 2035, 2008 Energy Action Plan Update, 2011 Energy Efficiency Strategic Plan, and SB 100 that requires 100 percent of retail sales of electricity to be generated from zero-carbon emission sources by 2045.

Plan Bay Area 2050, the Bay Area's regional long-range plan adopted by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG), includes thirty-five strategies. Plan Bay Area 2050 includes an implementation plan addressing how it anticipates strategies will be implemented MTC, ABAG, regional partners, and local governments. Plan Bay Area 2050 does not require specific actions of local governments, but rather supports and encourages actions to implement the Plan Bay Area 2050 strategies. Neither the Project nor Alternative 5 include policies and programs that would impede or conflict with Plan Bay Area 2050, but rather they include policies and programs that support implementation of Plan Bay Area 2050. The housing development accommodated by both the Project and Alternative 5 is based on the Final Regional Housing Needs Allocation (RHNA) Plan (RHNA Plan) prepared by ABAG. The RHNA Plan was developed to be consistent with the forecasted development pattern from Plan Bay Area 2050.[27,28] The goals, along with the supporting policies and programs for each goal, in the Project and Alternative 5 support and do not conflict with the Plan Bay Area strategies. Specifically, Goal H-1, as proposed under the Project and Alternative 5, addresses preserving housing and neighborhood assets, which supports Plan Bay Area housing strategy H2. The Project and Alternative 5 Goal H-2 supports housing diversity, opportunities and assistance, which supports Plan Bay Area housing strategies H3, H4, H5, H6, H7, and H8. The Project and Alternative 5 Goal H-3 reduces constraints to housing development, rehabilitation, and preservation, supporting Plan Bay Area housing strategies H-3 and H-4. The Project and Alternative 5 Goal H-4 affirmatively furthers fair and equal housing access and opportunities, supporting Plan Bay Area housing strategies H-1 and H-7. Neither the Project nor Alternative 5 include components that would conflict with Plan Bay Area economy strategies, which address a Statewide universal basic income, internet access, employment, and commercial and industrial development, transportation strategies, which address the circulation system,

[27] ABAG. 2021. Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031. November 2022.
[28] ABAG. Plan Bay Area 2050. October 2021. pp. 34

mobility, and access to transit, or environment strategies, which address adapting to sea level rise, encouraging energy efficiency, orderly growth, and reducing vehicle trips/miles.

The BAAQMD 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate. To protect public health, the plan describes how the BAAQMD will continue our progress toward attaining all state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the plan defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious greenhouse gas reduction targets for 2030 and 2050, and provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets. The 2017 Plan includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants; to reduce emissions of methane and other "super-GHGs" that are potent climate pollutants in the near-term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion. Both the Project and Alternative 5 would be required to comply with all applicable control measures, including those that affect energy both directly and indirectly.

The California Energy Commission, in partnership with the California Air Resources Board, prepared the State Alternative Fuels Plan as required by Assembly Bill 1007. The Final Commission Report was adopted on December 5, 2007. The Project and Alternative 5 address housing development, rehabilitation, and conservation and do not include any components that would require use of gasoline-powered cars or trucks or impede increased use of alternatively-fueled vehicles. Therefore, Neither the Project nor Alternative 5 would conflict with this plan.

Executive Order N-79-20 set new statewide goals for phasing out gasoline-powered cars and trucks in the state. The Project and Alternative 5 do not include any components that would require use of gasoline-powered cars and trucks; therefore, neither the Project nor Alternative 5 would conflict with this Executive Order.

Furthermore, the California Public Utilities Commission prepared the 2008 Energy Action Plan Update in February 2008, and the 2011 Energy Efficiency Strategic Plan in January 2011. These plans provide roadmaps for improving energy efficiency. The Project and Alternative 5 would not conflict with these plans; future development accommodated by Both the Project and Alternative 5 would be required to comply with the current version of the CalGreen Standards and the California Building Standards Code.

SB 100, officially titled "The 100 Percent Clean Energy Act of 2018," Senate Bill 100 (SB 100, De León), sets a 2045 goal of powering all retail electricity sold in California and state agency electricity needs with renewable and zero-carbon resources — those such as solar and wind energy that do not emit climate-altering greenhouse gases, updates the state's Renewables Portfolio Standard to ensure that by 2030 at least 60 percent of California's electricity is renewable, and requires the Energy Commission, Public Utilities Commission and Air

Resources Board to use programs under existing laws to achieve 100 percent clean electricity and issue a joint policy report on SB 100 by 2021 and every four years thereafter. The Project and Alternative 5 would encourage energy-efficiency through Programs 1 and 18. There are no policies or programs in the Project or Alternative 5 that would limit use of renewable and zero-carbon resources. Therefore, neither the Project nor Alternative 5 would conflict with any of these provisions of SB 100.

In addition, compliance with the City's CAP policies, General Plan policies and programs, and adherence to the standards in the Sausalito Municipal Code, would ensure that potential new development associated with implementation of either the Project or Alternative 5 will not conflict with or obstruct State or local plans for renewable energy or energy efficiency. Therefore, implementation of the Project and Alternative 5 would have a similar impact complying with relevant renewable energy or energy efficiency plans, and both the Project and Alternative 5 would have a ***less-than-significant impact*** under this criterion.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-26 Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impacts with respect to energy resources. (See Impact 3.5-3 for cumulative plus Project impacts related to this topic)

This analysis evaluates whether the impacts of Alternative 5, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to energy resources. This analysis then considers whether the incremental contribution of the impacts associated with the implementation of Alternative 5 would be considerable. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact.

The geographic context for this analysis includes the Sausalito Planning Area, Marin City, Mill Valley, Tiburon, Belvedere, and other adjacent unincorporated areas. Past, present, and future development projects contribute to energy impacts. All cumulative projects would be required to comply with local ordinances and policies that address energy conservation and energy efficiency, such as complying with the latest California Energy Code.

The Plan Bay Area 2050 EIR notes that mitigation, via climate action plans for individual jurisdictions, or other programs, including retrofitting existing buildings, installing renewable

energy facilities that replace reliance on fossil-fuel power in the region, altering the vehicle fleet (toward more non-fossil fuel-powered vehicles), and implementing other measures would be required to meet the goals needed for the State to attain the 2030 and 2050 targets for GHG emissions reductions and energy efficiency. However, there is no assurance that the measures would reduce energy consumption impacts to a less-than-significant level. Therefore, the cumulative impact of development on energy resources is potentially significant.

Implementation of Alternative 5 would develop both residential and nonresidential uses, resulting in the consumption of energy resources during both the construction and operational phases of individual projects. Individual projects would conserve energy and not result in the wasteful, inefficient, or unnecessary consumption of energy. Therefore, implementation of Alternative 5 will have a ***less-than-significant impact***, as it would be under the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Geology, Soils, and Seismicity

Information regarding the existing setting, regulatory setting, and thresholds of significance for Geology, Soils, and Seismicity impacts can be found on pages 3.6-1 through 3.6-16 in Section 3.6, Geology, Soils, and Seismicity, of the Draft EIR.

Impact 4.5-27 Implementation of Alternative 5 would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death from seismic events. (See Impact 3.6-1 for Project impacts related to this topic)

Given the City's proximity to the San Andreas Fault Zone, as well as other active faults, it is likely that the Sausalito Planning Area will experience periodic minor to strong earthquake motion. Within the Planning Area, the primary hazard associated with earthquakes is seismic ground shaking which, as shown in Figure 3.6-2, is estimated to be very strong in hillside areas and violent along the waterfront. Under Alternative 5, new residents would be exposed to potentially dangerous earthquake conditions; Opportunity Site 14 would be in a "severe shaking" area, while Opportunity Site 52 would be in a "violent shaking" area. However, the reduction of units on Opportunity Site 84 would reduce the number of residents exposed to a potential "violent shaking" episode. Secondary hazards may include liquefaction, seismically induced landslides, and subsidence, especially in the waterfront area which is largely underlain by surficial deposits that would be particularly prone to liquefaction and subsidence, as shown in Figure 3.6-3. Under Alternative 5, Opportunity Site 14 would have low susceptibility to liquefaction, while Opportunity Site 52 is in an area where the site is shown to have very low susceptibility for liquefaction, but is immediately adjacent to an area that has very high susceptibility to liquefaction. However, the reduction of units on Opportunity Site 84 would reduce the number of residents exposed to very high liquefaction susceptibility. Hillside areas would have a higher likelihood for landslides, as shown in Figure 3.6-4. Under Alternative 5, Opportunity Site 14 would be in an area that is highly susceptible to landslides. Opportunity Site 52 would be in an area of moderate to high susceptibility to landslides. Opportunity Site 84 is in an area of low landslide susceptibility, so the reduction in the number of units on that site would not measurably change potential impacts. The intensity of seismic ground shaking within the Planning Area would depend upon characteristics of the generating fault, distance to the earthquake epicenter and rupture zone, the magnitude and duration of the earthquake, and site-specific geologic conditions.

Implementation of Program 4 of the Project and Alternative 5 would not directly construct new site-specific housing in the City but, would facilitate new residential development on designated housing opportunity sites in order to meet the City's RHNA allocation. Implementation of Program 4 involves the City completing rezoning or adoption of overlay zones to allow development of residential units on identified opportunity sites at densities identified in the Housing Element. As a nearly built-out City with much of the land constrained by environmental factors and a significant amount of land under permanent open space restrictions, new housing development in Sausalito would rely heavily on infill of

vacant and underutilized parcels. As part of the Amended Housing Element, and as described in the Chapter 2.0 Project Description, in order to accommodate the City's remaining RHNA of 463 units, the City would create Opportunity Sites to ensure development is permitted. As such, additional residents could be potentially exposed to the effects of fault rupture, seismic ground shaking, liquefaction, subsidence, and landslides from local and regional earthquakes. Under Alternative 5, development on Opportunity Site 14 would expose new residents to potentially severe earth shaking, and high susceptibility to landslides. Structures that would be built on steep slopes could be exposed to an existing risk of landslide or, if improperly constructed, could exacerbate existing landslide conditions. New structures built under the development standards enacted to implement the Project and Alternative 5 could also experience substantial damage during seismic events. All opportunity sites under both the Project and Alternative 5 are in areas of "severe shaking" or "violent shaking" as described by the Modified Mercalli Intensity Scale. As discussed below, policies and programs included in the General Plan address potential impacts of future development through enhanced requirements for applicants to provide sufficient geotechnical data and reports to demonstrate that any site-specific conditions can be appropriately addressed through site preparation and construction techniques.

The General Plan includes policies and programs to protect existing and future residents of the City and surrounding areas from seismically induced hazards, which would apply equally to the Project and Alternative 5. To mitigate potential dangers of earthquake damage, General Plan Programs HS-1.1.1 and HS-1.1.2 require the City to update and enhance its Building Code and URM Buildings Ordinance, respectively, to reflect current standards of earthquake safety. Additionally, Program HS-1.2.2 requires the City to continue to collaborate with the County on the MCM LHMP, which addresses hazards related to earthquakes. Lastly, Program HS-1.2.4 requires geotechnical reports for appropriate grading and building permits.

Potential structural damage and exposure of people to risk of injury or death from structural failure would be further minimized by compliance with CBC engineering design and construction measures. Under both the Project and Alternative 5, foundations and other structural support features would be designed to resist or absorb damaging forces from strong ground shaking, liquefaction, and subsidence according to Chapter 8.08 of the Sausalito Municipal Code, which incorporates the most recent CBC. The Building Department reviews plans and applications for site clearance, grading, and building permits to ensure compliance with Municipal Code Chapter 8.08 and imposes requirements for revisions where needed to ensure that new or significantly remodeled structures are constructed in compliance with the CBC, and reflect any additional measures deemed appropriate based on geotechnical analysis, such as would be required by Programs HS-1.2.3 and HS-1.2.4, which would evaluate site-specific conditions and identify any specific site preparation and/or construction techniques. Permit issuance would be based upon satisfactory

completion of any identified applicable measures as imposed on both the Project and Alternative 5.

General Plan Programs HS-1.2.5, HS-1.2.6, HS-1.2.7, HS-1.9.1, HS-1.11.1, and S. 3.2.1 and S-3.2.2 would also require implementation of programs that include geotechnical analyses and building code compliance for future developments and to provide mitigation for seismic hazards. Implementation of these programs for the Project and Alternative 5 would ensure that appropriate emergency strategies are in place in the event of an earthquake, including the preparation of geologic hazard abatement district maps for soils and seismic safety, as well as coordinating information among emergency responders. While analyzing the potential future effects of implementing the Project and Alternative 5 necessarily involves some degree of forecasting, identifying specific examples of what could happen as a result of an individual development proposal is too speculative at this time. In reviewing individual project applications, the City would determine which policies and programs apply, depending on the specific characteristics of the project type and/or project site during the development review process.

The potential impacts of earthquake shaking would be almost equal under Alternative 5 as compared to the Project because a slight reduction of units on Site 84 and reallocation to Site 14 and Site 52 would keep some new residents in an area of potential "violent shaking," while moving others to an area of "severe shaking." Alternative 5 would be slightly better than the Project in regard to liquefaction hazards because it would move some people from a very high liquefaction zone (Site 84) to areas of very low liquefaction (Site 14 and Site 52). Potential landslide hazards would be slightly worse under Alternative 5 as compared to the Project because it would reallocate people from an area of low landslide potential (Site 84) to sites of moderate to high landslide potential (Site 14 and Site 52).

In conclusion, compliance with mandatory CBC requirements and implementation of the General Plan policies and programs would ensure that future development projects associated with the Project and Alternative 5 are appropriately investigated in terms of potential seismic hazards and that any new buildings and structures are constructed to withstand the anticipated range of seismic events. As such, potential impacts would be similar for the Project and Alternative 5 and would be reduced to ***less-than-significant*** levels under the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-28 **Implementation of Alternative 5 would not result in a significant impact related to development on unstable geologic units or soil, or result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. (See Impact 3.6-2 for Project impacts related to this topic)**

Certain geologic units present in the Sausalito Planning Area could have the potential for landslides, slope instability, and liquefaction. Other geologic hazards, such as subsidence, lateral spreading, or collapse, could also be present in the Planning Area. Development allowed under the Project and Alternative 5 could occur within areas containing unstable geologic units. The waterfront area of Sausalito, which is largely underlain by surficial deposits, would be particularly prone to liquefaction and subsidence, as shown in Figure 3.6-3. Under Alternative 5, Opportunity Site 14 would have low susceptibility to liquefaction, while Opportunity Site 52 is in an area where the site is shown to have very low susceptibility for liquefaction, but is immediately adjacent to an area that has very high susceptibility to liquefaction. However, the reduction of units on Opportunity Site 84 would reduce the number of residents exposed to very high liquefaction susceptibility. Hillside areas would have a higher likelihood for landslides, as shown in Figure 3.6-4. Under Alternative 5, Opportunity Site 14 would be in an area that is highly susceptible to landslides. Opportunity Site 52 would be in an area of moderate to high susceptibility to landslides. Opportunity Site 84 is in an area of low landslide susceptibility, so the reduction in the number of units on that site would not measurably change potential impacts.

The Landslide Task Force made recommendations to the Sausalito City Council regarding unstable geologic units, some of which have been incorporated into the General Plan. One of the recommendations was to map local geology and geologic hazards for both slope stability and seismic hazards. The hazard maps assist the City in identifying public drainage systems that need updates and repairs and identifying open space areas upslope of City infrastructure or residential structures that have a potential for failure. Such areas could then be prioritized for stabilization measures to minimize or eliminate future failures. Other Landslide Task Force recommendations included creating a mechanism for residents to report emerging landslide risks, the development of new building and remodeling guidelines, and the formation of a Geologic Hazard Abatement District (GHAD).[29]

The Project and Alternative 5 identifies future land uses, but does not describe specific development projects that would be undertaken over the course of the eight-year housing cycle. Thus, estimating project-specific impacts would involve unreasonable speculation. The General Plan includes a number of policies and programs specifically designed to protect individuals from injuries and minimize property damage resulting from land instability and geologic hazards by limiting development in certain areas and requiring increased review and mitigation where appropriate, which would apply equally to the Project and Alternative

[29] Landslide Task Force. 2019. Landslide Task Force Report and Recommendation to Sausalito City Council. September 24.

5. Program HS-1.2.1 requires the City to develop and maintain a citywide GIS map identifying geologic conditions and hazards including landslides, drainage, erosion hotspots, subsidence, liquefaction, parcel slope, and other relevant geologic data. Program HS 1.2.6 requires the City to create a hillside ordinance that may require heightened review and financial securities for development on steeply sloped sites, which would be important for Site 14 under Alternative 5 given the site's topography. Program HS-1.2.7 requires the City to consider creating a GHAD and explore other methods of funding hazard abatement. Program HS-1.2.3 requires submittal of geologic and/or geotechnical feasibility reports for development of new buildings or significant additions to existing buildings requiring discretionary approval, and Program HS-1.2.4 requires geotechnical reports be prepared before the City issues grading and building permits. Together these five policies and programs would assist property owners, applicants, and the City to efficiently identify potential risks associated with development of a parcel and ensure that appropriate geotechnical review is completed prior to development, including the identification of remedial site preparation and/or construction techniques to be incorporated into grading and building plans. Program HS-1.2.2 requires the City to continue to collaborate with the County on the MCM LHMP, which addresses hazards related to liquefaction and landslides. As such, development facilitated by the Project and Alternative 5 would comply with the General Plan policies and programs and would be rigorously analyzed; plans for development would incorporate geotechnical recommendations, where needed, to ensure that construction would employ techniques appropriate for a given site.

The Sausalito Municipal Code also contains rules and regulations to address development on unstable geologic units and would apply to future development under both the Project and Alternative 5. Chapter 17.08 (Excavations Generally) sets forth rules and regulations to control excavation, grading, and earthwork construction on land to safeguard public health, safety, and welfare. Section 17.08.010 requires that a permit be obtained for any excavation under or on the surface of any land, public or private, to ensure that appropriate construction techniques are utilized to address development on unstable geologic units.

The Building Department reviews plans and applications for site clearance, grading, and building permits to ensure compliance with Municipal Code Chapter 8.08 and imposes requirements for revisions to plans and applications where needed to ensure that structures are constructed in compliance with the CBC, and reflect any additional measures deemed appropriate based on a required geotechnical report that evaluates site specific conditions and identifies any site preparation or construction techniques. As discussed in Impact 4.5-22, grading and building permit issuance is based upon satisfactory completion of any applicable measures.

Alternative 5 would be slightly better than the Project in regard to liquefaction hazards because it would move some people from a very high liquefaction zone (Site 84) to areas of very low liquefaction (Site 14 and Site 52). Potential landslide hazards would be slightly worse under Alternative 5 as compared to the Project because it would reallocate people from an

area of low landslide potential (Site 84) to sites of moderate to high landslide potential (Site 14 and Site 52).

With the implementation of the policies and programs in the General Plan, as well as applicable State and local codes, potential ground instability or failure impacts would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-29	**Implementation of Alternative 5 would not result in the construction of structures on expansive soils (soils with shrink-swell potential), creating substantial direct or indirect risks to life or property. (See Impact 3.6-3 for Project impacts related to this topic)**

Implementation of the Project or Alternative 5 would not directly construct new housing in the City but, through the adoption of new development standards, it would facilitate new residential development on specific sites in order to meet the City's RHNA allocation. New development constructed on expansive soils could be subject to damage or become unstable when underlying soil shrinks or swells. As discussed in the General Plan EIR, there is generally a low to moderate risk of damage from expansive soils throughout most of the City, though risk of damage is moderate to high in low-lying areas along Richardson Bay. The CBC includes requirements to address soil-related hazards, including expansive soils. Typical measures to treat hazardous soil conditions involve removal, proper fill selection, and compaction. In cases where sufficiently mitigating hazardous soils is not feasible, the CBC requires structural reinforcement of foundations to resist expansive soil forces.

While the Project and Alternative 5 do not propose any development directly, both the Project and Alternative 5 identify specific sites that are appropriate for residential development and enact development standards to increase the development potential of those specific sites. As noted above, the General Plan includes a number of policies and programs specifically designed to protect residents from injuries and minimize property damage resulting from geologic hazards, such as expansive soils, which would apply equally to the Project and Alternative 5. General Plan Program HS-1.2.4 requires geotechnical reports for grading and building permits, whether a project is subject to ministerial or discretionary review. The Building Department reviews plans and applications for site clearance, grading, and building permits to ensure compliance with Municipal Code Chapter

8.08 and imposes requirements for revisions where needed to ensure that structures are constructed in compliance with the CBC, and reflect any additional measures deemed appropriate based on a required geotechnical report that evaluates site-specific conditions such as expansive soils, and identifies any site preparation or construction techniques that may be required to mitigate geological hazards. Permit issuance is based upon satisfactory completion of any applicable measures. Impacts under Alternative 5 would be similar to those under the Project because compliance with the same policies and site-specific recommendations would be required. The Project's and Alternative 5's compliance with requirements of the CBC would reduce potential impacts related to expansive soils to a ***less-than-significant*** level for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-30	**Implementation of Alternative 5 would not result in substantial soil erosion or the loss of topsoil. (See Impact 3.6-4 for Project impacts related to this topic)**

Implementation of the Project or Alternative 5 would not directly construct new housing in the City but, through the adoption of new development standards, they would facilitate new residential development throughout the city in order to meet the City's RHNA allocation. Development under both the Project and Alternative 5 would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities at site-specific locations. These construction activities would result in temporary disturbance of soil and would expose disturbed areas to storm events. Rain of sufficient intensity and duration could dislodge soil particles, generate runoff, and cause localized erosion and sedimentation. As such, soil erosion is dependent on individual site locations and conditions on-site during construction. Alternative 5 would have two additional Opportunity Sites available for development – Site 14 and Site 52 – as compared to the Project if there is a shortfall to accommodate the RHNA.

The RWQCB has issued the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), which regulates stormwater discharges related to construction activities.[30] Projects disturbing one or more acres of soil, or whose projects

[30] Order 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-006-DWQ.

disturb less than one acre but are part of a larger common plan of development that, in total, disturbs one or more acres, are required to obtain coverage under the Construction General Permit. Compliance with the permit requires each qualifying development project to file a Notice of Intent with the State Water Board. Permit conditions require development of a Stormwater Pollution Prevention Plan (SWPPP), which must describe the site, facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. As is noted in the General Plan EIR, inspection of construction sites before and after a storm is also required to identify stormwater discharge from construction activity and to identify and implement erosion controls, where necessary. Further discussion on hydrological procedures and maintenance can be found in Section 3.9, Hydrology and Water Quality, of this Draft EIR.

Future development in accordance with the Project and Alternative 5 would be equally subject to General Plan policy and program requirements. The General Plan includes policies and programs to map areas with high susceptibility to erosion and protect water quality, which also address soil erosion. General Plan Program HS-1.2.1 requires the City to develop and maintain a citywide GIS map that serves as a detailed geologic map to provide a more detailed database regarding landslides, drainage, erosion hotspots, subsidence, liquefaction, parcel slope, and other relevant geologic data. The implementation of this Program will help prevent harmful impacts to new residents; new development built in accordance with Program 1.2.1 will not exacerbate geologic hazards.

General Plan Program HS 1.2.6 requires the City to create a hillside ordinance that may require heightened review and financial securities for development on steeply sloped sites, including the development of the Project sites or Alternative 5 sites. This could be important for Site 14 under Alternative 5 given the site's topography and steep slopes. Program HS-1.2.7 requires the City to consider creating a GHAD and explore other methods of funding hazard abatement. Program EQ-4.1.1 requires the City to continue to participate in the MCSTOPPP.

In addition, Chapter 17.08 of the Sausalito Municipal Code sets forth rules and regulations to control excavation, grading, and earthwork construction on land to safeguard public health, safety, and welfare. The City's Urban Runoff Pollution Prevention Ordinance (Municipal Code Chapter 11.17) requires the implementation of construction Best Management Practices (BMPs), including erosion and sediment control plan requirements, which directly address the potential for erosion and loss of topsoil during construction of projects pursued under the Project or Alternative 5. Together with RWQCB requirements, construction projects are appropriately required to incorporate BMPs that effectively reduce the potential for erosion and sedimentation in on-site or off-site watercourses.

In addition to compliance with mandatory NPDES permit and Sausalito Municipal Code requirements, implementation of General Plan policies and programs would further reduce the potential erosion and loss of topsoil from construction-related soil disturbance for both the Project and Alternative 5. Alternative 5 could develop more locations, with the potential to develop Sites 14 and 52 Alternative 5 could disturb slightly more topsoil, but the Project could develop more of Site 84 than Alternative 5, resulting in a similar level of impact between the Project and Alternative 5. Nonetheless, the Project's and Alternative 5's potential impacts related to erosion and loss of topsoil would be ***less than significant***.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

None Required Level of Significance after Mitigation
Less than Significant

Impact 4.5-31	**Implementation of Alternative 5 would not place septic tanks or alternative wastewater disposal systems in areas where soils are not capable of supporting such uses. (See Impact 3.6-5 for Project impacts related to this topic)**

The General Plan encourages growth management and development within City limits. Under the Project and Alternative 5, the location and timing of growth in the City has been planned with consideration for infrastructure capacity, public service availability, and fiscal impacts. Development facilitated by both the Project and Alternative 5 would be served by the existing sewer system because all new residential and apartment buildings shall install new sewer service laterals to connect to the existing sanitary sewer system, as established in Section 18.12.100 of the City Municipal Code.

Sausalito Municipal Code Chapter 18.12 addresses sanitary sewers regulations; this Chapter explains that new development should connect to existing sewer systems and should not connect to alternative wastewater disposals systems. However, the overall Title (Title 18 Public Services) recognizes that some pre-existing infrastructure may already use an alternative sewer system. For such cases, Municipal Code Chapter 18.14 adopts Marin County Code Chapter 18.06 which allows and sets requirements for disposal of sanitary sewage by septic tank and other methods not connected to a sanitary sewer system. While the Project nor Alternative 5 do not propose any development directly, general development that will be permitted to occur in accordance with the Project or Alternative 5 is not expected to include any use of an alternative sewer system, including septic tanks.

However, should any new development require the installation of septic tanks or alternative wastewater disposal systems due to site-specific conditions, the General Plan includes

policies and programs to ensure that any new development can be feasibly constructed according to soil conditions. Policy S-3.8 ensures that applications for construction must demonstrate the availability of adequate septic leach fields, where required. Program S-3.8.5 reinforces this policy, requiring written documentation from the Marin County Environmental Health Department that there would be sufficient capacity for leach fields prior to project approval in areas dependent upon septic tanks. Program HS-1.2.4 requires geotechnical reports prior to the issuance of grading and building permits. As such, any proposed septic tanks or alternative wastewater disposal systems facilitated by the Project or Alternative 5 would be analyzed in a geologic report in which recommendations could be made regarding unstable soil concerns. Further discussion on sewer and utilities systems can be found in Section 3.15, Utilities and Service Systems, of this Draft EIR.

Implementation of policies and programs in the General Plan, as well as applicable local codes, would ensure that new septic tanks or alternative wastewater disposal systems associated with the Project and Alternative 5 would be constructed on soils that can support such systems. The impact of Alternative 5 on alternative wastewater disposal systems in areas where soils are not capable of supporting such uses would be identical to those impacts under the Project. Therefore, impacts would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

None Required Level of Significance after Mitigation
Less than Significant

Impact 4.5-32	**Implementation of Alternative 5 could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (See Impact 3.6-6 for Project impacts related to this topic)**

Any project involving earth-moving activity, including those expected to occur under the Project and Alternative 5, could potentially result in inadvertent discovery and disturbance of paleontological resources during grading and excavation work. However, based on the Paleontological Records Search conducted for the General Plan, the Sausalito Planning Area is predominately located on non-fossiliferous geologic units, does not contain any identified paleontological resources, and the likelihood of encountering paleontological resources is low under both the Project and Alternative 5.

As discussed in the Paleontological Records Search, the only potentially fossiliferous units are the Quaternary alluvium (if it is Pleistocene) mapped over a relatively small land area,

and the Cretaceous-Jurassic mélange that has a very low paleontological potential. Development under the Project and Alternative 5 is not expected to uncover previously undiscovered paleontological resources.

Under the Project and Alternative 5, potential impacts to paleontological resources would be minimized through compliance with federal and State laws that protect paleontological resources. Section 5097 of the Public Resources Code specifies procedures to be followed in the event of unexpected discovery of paleontological resources. Implementation of development facilitated by the Project and Alternative 5 would require compliance with local, State, and federal regulations, which would reduce the potential to impact paleontological resources directly and indirectly.

Nonetheless, in the unlikely event that any earth-disturbing construction-related activities performed under the Project or Alternative 5 uncover any significant fossils (i.e., bones or teeth), construction activities would halt as the project would create potentially significant impacts with regards to unique paleontological resources and unique geologic features. The potential to uncover previously undiscovered paleontological resources is expected to be similar under Alternative 5 as under the Project. Therefore, the impact is ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-32 Implement Mitigation Measure 3.6-6.

> **MM 3.6-6** If any paleontological resources (fossils) or unique geologic features are discovered during grading or construction activities within the project area, work shall be halted immediately within 50 feet of the discovery, and the City Planning Division shall be immediately notified. The project owner shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (SVP 2010). The recovery plan may include but is not limited to a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. The recovery plan shall state which resources will be avoided and which shall be recovered for their data potential. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources. The recovery plan shall also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at an accredited repository, data analysis, and reporting. Recommendations in the recovery

plan will be implemented by the applicant before construction activities resume in the area where the paleontological resources were discovered.

At the conclusion of laboratory work and museum curation, a final report will be prepared describing the results of the paleontological monitoring efforts associated with the individual project. The report will include a summary of the field and laboratory methods, an overview of the project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository.

Level of Significance after Mitigation
Less than Significant

To enforce halting of construction activities and ensure protection of unique paleontological resources and unique geologic features under Alternative 5, Mitigation Measure 4.5-32 would suspend construction and require a professional paleontologist to prepare a recovery plan. Construction – including excavation and grading – activities under Alternative 5 would be suspended until the recommendations in the recovery plan, that the City determines to be necessary and feasible, are implemented by the project applicant. This mitigation measure would reduce impacts under the Project and Alternative 5 to a ***less-than-significant level***.

Impact 4.5-33	**Development facilitated by implementation of Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to geology, soils, seismicity, or paleontological resources. (See Impact 3.6-7 for cumulative plus Project impacts related to this topic)**

The geographic context for analysis of cumulative impacts related to geology, soils, and seismicity includes the incorporated and unincorporated lands comprising the Sausalito Planning Area. The geographic context for paleontological resources includes Marin County. This analysis evaluates whether impacts of Alternative 5, together with impacts of cumulative development, could result in a cumulatively significant impact to geology, soils, seismicity, or paleontological resources. This analysis then considers whether incremental contribution of impacts associated with implementation of Alternative 5 would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of significance.

Potentially adverse environmental effects associated with seismic hazards, as well as those associated with expansive soils, topographic alteration, and erosion, usually are site-specific and generally do not result in cumulative effects.

Cumulative projects could be exposed to moderate to strong ground shaking during seismic events, but the development of individual projects would not increase the potential for impacts to occur. Individual development proposals would be reviewed separately by the appropriate public agency depending on location and undergo environmental review if appropriate. In the event that future cumulative development would result in impacts related to geologic or seismic impacts, those potential project- or site-specific impacts would be addressed in accordance with the requirements of CEQA. New buildings would be constructed utilizing current design and construction methodologies for earthquake resistant design as required by relevant regulations, including the Marin County Code. Compliance with the CBC, NPDES permits, laws and regulations mentioned above, would ensure that cumulative development would have ***less-than-significant impacts*** for Alternative 5 and the Project regarding geology, soils, or seismicity.

As cumulative development occurs, all future projects must comply with the federal, State, and pertinent local regulations regarding structural stability to reduce potential impacts from liquefaction, lateral spreading, or landslides. Compliance with established regulations, including the CBC, would result in ***less-than-significant cumulative impacts*** for Alternative 5 and the Project related to subsidence or collapse.

It is expected, and desired by the City, that new development associated with Alternative 5 would connect to existing sewer systems. However, under Municipal Code previsions, alternative waste water systems are allowed within the Planning Area. Therefore, while unlikely, cumulative development within the Sausalito Planning Area could result in the use of septic tank systems in the future, particularly within areas under the jurisdiction of Marin County. However, compliance with the Municipal Code and General Plan policies would ensure cumulative development would not contribute to potentially-significant impacts on the soils. General Plan Program S-3.8.5 requires written documentation from the Marin County Environmental Health Department that there is sufficient capacity for leach fields prior to project approval in areas dependent upon septic tanks. Sausalito Municipal Code Section 18.12.060 includes regulations regarding the process for connecting to the public sanitary sewer system. The requirements include prohibitions on septic tanks, cesspools, or other individual sewage disposal systems, and may also require the installation, by a property owner, of an extension of a sewer main within a public utility easement or city street right-of-way to the point of the service lateral connection as determined by the City Engineer to address any leaks and/or ensure sufficient capacity. Therefore, the cumulative impact on septic systems for Alternative 5 and the Project would be ***less than significant***.

Any project involving earth-moving activity could potentially result in inadvertent discovery and disturbance of paleontological resources during grading and excavation work; these inadvertent discoveries could create potentially significant impacts.

As analyzed in Impact 4.5-32, the Sausalito Planning Area is predominately located on non-fossiliferous geologic units, does not contain any identified paleontological resources, and the likelihood of encountering paleontological resources is low. The only potentially fossiliferous units are mapped over a relatively small land area. This indicates that, while unlikely, future development within the Sausalito Planning Area could have potential to cumulatively impact paleontological resources, and inadvertent discovery of paleontological resources could occur in the Planning Area, resulting in a potentially significant cumulative impact. Alternative 5 facilitates development throughout Sausalito, with a focus of intensifying residential development on identified Opportunity and Inventory Sites. Development under Alternative 5 could result in potential impacts to paleontological resources, and Alternative 5's contribution to the impact would be considerable. Therefore, cumulative impacts to paleontological resources would be ***potentially significant***, as it would be under the Project.

Level of Significance before Mitigation

Potentially Significant

Mitigation Measures

MM 4.5-33 Implement Mitigation Measure 3.6-6.

Level of Significance after Mitigation
Less than Significant

To enforce halting of construction activities, and ensure protection of unique paleontological resources and unique geologic features, Mitigation Measure 4.5-33 would suspend construction for projects developed as part of Alternative 5 and require a professional paleontologist to prepare a recovery plan. Construction, including excavation and grading activities, would be suspended until the recommendations in the recovery plan, that the City determines to be necessary and feasible, are implemented by the project applicant. The cumulative impact would be less than significant, as it would be under the Project.

Greenhouse Gas Emissions

Information regarding the existing setting, regulatory setting, and thresholds of significance for Greenhouse Gas Emissions impacts can be found on pages 3.7-1 through 3.7-26 in Section 3.7, Greenhouse Gas Emissions, of the Draft EIR.

Impact 4.5-34	**Implementation of Alternative 5 would not directly or indirectly generate GHG emissions that may have a significant impact on the environment. (See Impact 3.7-1 for Project impacts related to this topic)**

Construction Emissions

The construction-related GHG emissions from buildout of the Project and Alternative 5 have been calculated through use of the CalEEMod model (see Appendix B and Appendix B1). Construction activities associated with future development under the Project and Alternative 5 would generate temporary short-term GHG emissions from heavy-duty construction equipment, worker trips, and material delivery and hauling to and from Opportunity Sites. On-site activities would consist of the operation of off-road construction equipment, as well as on-site truck travel (e.g., haul trucks, dump trucks, and concrete trucks). Off-site sources would include emissions from construction vehicles used for hauling materials and worker vehicle trips.

The City's General Plan includes policies and programs specifically designed to address GHG emissions during project construction activities and would apply equally to the Project and Alternative 5. Program S-2.2.1 calls for the City to increase outreach to marinas and those applying for landscaping or demolition permits of Zero Waste Marin's wood recycling programs to maximize building salvage. Program EQ-5.2.6 requires the City to give preference to contractors and contracts for services to firms that use reduced-emission equipment and/or practice sustainable operations.

Additionally, the Sausalito Municipal Code contains rules and regulations to reduce GHG emissions during construction, which would apply equally to the Project and Alternative 5. Chapter 8.54 promotes the redirection of recyclable materials generated during construction away from landfills. All project applicants pursuing projects under the Project or Alternative 5 are required to complete and submit a recycling management plan to estimate the volume of debris to be generated during construction and the estimated amount of debris that would be sent to the landfill. The intent of Chapter 8.54 is to divert at least 50 percent of all debris waste from most construction, demolition, and renovation projects away from local landfills.

Future development under the Project and Alternative 5 would comply with the requirements of the General Plan policies and programs related to GHG emissions as well as applicable BAAQMD regulations and standards in the Sausalito Municipal Code.

Table 4-9 shows the GHG emissions generated by implementation of the Amended Housing Element. It should be noted that Table 4-9 represents a conservative estimate of construction-related emissions, as full implementation of the Project and Alternative 5 was assumed to occur by 2030, though actual buildout of both the Project and Alternative 5 is anticipated to take longer.[31] As shown in Table 4-9, the annual maximum construction-related GHG emissions is anticipated to be approximately 1,493 MT CO2e under the Project, and 1,478 MT CO2e under Alternative 5. These emissions results are provided for the sake of disclosure. Further detail is provided in Appendix B.

TABLE 4-9: PROJECT CONSTRUCTION-RELATED GHG EMISSIONS AT PROJECT AND ALTERNATIVE 5 BUILDOUT

CATEGORY	Proposed Project **CONSTRUCTION GHG EMISSIONS (MT CO_2e)**	Alternative 5 **CONSTRUCTION GHG EMISSIONS (MT CO_2e)**
Annual (Maximum)	1,493	1,478

Source: CALEEMOD Model Version 2022.1 (see Appendix B and Appendix B1).

Operational Emissions

The operational GHG emissions from buildout of the Project and Alternative 5 have been calculated through use of the CalEEMod model (see Appendix B and Appendix B1). The operational GHG emissions are based on buildout of the Project – 1,147 dwelling units and 5,171 square feet of nonresidential uses — and Alternative 5 – 1,133 dwelling units and 5,171 square feet of nonresidential uses.

Table 4-10 shows the GHG emissions generated from the entire city for the year 2031 for both the Project and Alternative 5. As demonstrated in Table 4-10, operational GHG emissions would be slightly less under Alternative 5 than the Project under every category. It should be noted that Table 4-10 is based on year 2025 emission rates from area sources, energy usage, solid waste, water and wastewater sources. Future State regulations, including SB 100 that requires 100 percent of retail sales of electricity to be generated from zero-carbon emissions sources by 2045, along with other regulations, would result in reducing these emissions sources to near zero levels. In addition, the transportation sources only incorporate previously adopted State regulations and do not account for recent State regulations, including the anticipated reductions from Executive Order N-79-20 that requires 100 percent of new passenger vehicles sold in California to be zero-emissions by 2035. These emissions results are provided for the sake of disclosure. Further detail is provided in Appendix B.

[31] It should be noted that construction-related on- and off-road emission factors tend to decrease over time. Therefore, assuming earlier buildout than is likely in reality would provide a conservative estimate of project buildout construction-related emissions.

TABLE 4-10: PROJECT OPERATION-RELATED GHG EMISSIONS AT BUILDOUT FOR THE PROJECT AND ALTERNATIVE 5

	OPERATION GHG EMISSIONS (MT CO_2e)						
	Bio CO2	Non-Bio CO_2	Total CO_2	CH_4	N_2O	R	CO_2e
PROPOSED PROJECT	87.3	11,370	11,457	9.34	0.39	10.4	11,817
ALTERNATIVE 5	83.2	11,235	11,321	9.22	0.38	10.3	11,676

Source: CALEEMOD Model Version 2022.1 (see Appendix B and Appendix B1).

Separately, the City's current General Plan would further reduce GHG emissions through additional policies and programs specifically designed to address GHG emissions during operation of both the Project and Alternative 5. Program EQ-5.1.5 requires the city to encourage business and residential use of clean-burning fuels. Program EQ-5.2.6 requires the city to give preference to contractors and contracts for services to firms that use reduced-emission equipment and/or practice sustainable operations. Program S-1.2.1 requires the city to encourage new development to utilize passive solar energy methods to reduce energy consumption to the extent feasible consistent with other design considerations, such as view retention, glare, and other requirements. Policy S-4.3 requires the installation of sustainable landscapes. Policy S-1.4 promotes the use of electricity for appliances that currently use natural gas. Program 1.2.1 1 encourages energy-conscious developments that minimize energy use through passive solar energy methods and climate control.

In addition, the 2022 California Code of Regulations Title 24 Part 6 standards (i.e., 2022 California Building Standards) also now require that all homes built in California shall have zero-net-energy use, which is achieved through energy-efficiency measures as well as required rooftop solar photovoltaic systems. Furthermore, lighting standards have increased within the 2022 California Building Standards, compared to the previous version of the standards. The 2022 California Building Standards also apply to nonresidential buildings and require a variety of energy efficiency measures to be implemented during construction of the structures to reduce energy as usage as well as GHG emissions. These standards would apply equally to the Project and Alternative 5.

Moreover, the California Green Building Standards Code—Part 11, Title 24, California Code of Regulations—known as CALGreen, would apply to the project. The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, stormwater management, building design, insulation, flooring, and framing, among others. Implementation of the CALGreen Code measures reduce energy consumption and vehicle trips and encourages the use of alternative-fuel vehicles, which reduces pollutant emissions.

The CEC estimates that the 2022 Title 24 standards will reduce 10 million metric tons of GHG over 30 years. When compared to the 2019 Title 24 standards, the 2022 update focuses on: encouraging electric heat pump technology and use; establishing electric-ready requirements when natural gas is installed; expanding solar photovoltaic (PV) system and battery storage standards; and strengthening ventilation standards to improve indoor air quality.

Furthermore, the City's Municipal Code also contains development standards that would reduce GHG emissions associated with implementation of the Project and Alternative 5. For example, Chapter 8.52 (Water Conserving Landscaping) contains regulations to support water conservation. Specifically, all landscaping proposed for review and/or approval by the City is required to comply with the provisions of the Water conservation Ordinance 326 adopted by the Marin Municipal Water District. Separately, Chapter 8.54 of the Municipal Code (Construction and Demolition Waste Recovery) promotes the redirection of recyclable materials generated during construction away from landfills. Chapter 11.12 (Preservation of Trees and Views) acknowledges the contribution of trees to the character and beauty of the city and provides guidelines to address potential conflicts between preservation of trees and view-related values. This chapter also encourages and promotes the planting and proper husbandry of trees throughout the city. Moreover, Chapter 11.30 (Single Use Carryout Bags) is intended to reduce the amount of plastic bag pollution in the environment, reduce the impacts of paper bags which cause other forms of pollution and greenhouse gas emissions, and encourage reusable bags by consumers and retailers.

Compliance with the City's General Plan policies and programs, adherence to the development standards in the Sausalito Municipal Code, as well as consistency with the 2022 California Buildings Standards and the latest version of the CALGreen Code would ensure that potential new development associated with implementation of the Project or Alternative 5 would not directly or indirectly generate GHG emissions that may have a significant impact on the environment. Emissions under Alternative 5 would be slightly less than under the Project, but not by a substantial amount, and the impacts would be slightly better. Therefore, implementation of the Project and Alternative 5 will have a ***less-than-significant impact*** under this criterion.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-35 Implementation of Alternative 5 would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. (See Impact 3.7-2 for Project impacts related to this topic)

The following plans have been adopted and are applicable to development anticipated to occur with implementation of the Project and Alternative 5.

City of Sausalito General Plan

The City's General Plan contains the following policies and programs to support the State's climate goals, which would apply equally to the Project and Alternative 5. Policy S-1.4 directs the city to evaluate alternative renewable energy sources for building systems that currently use natural gas for heating. Policy S-1.3 encourages renewable energy generation and installations and/or purchasing MCE 100 percent renewable Deep Green service level in residential and commercial buildings. In addition, the 2022 California Code of Regulations Title 24 Part 6 standards also now require that all homes built in California shall have zero-net-energy use, which is achieved through energy-efficiency measures as well as required rooftop solar photovoltaic systems. The 2022 California Code of Regulations Title 24 Part 6 standards also apply to nonresidential buildings and require a variety of energy efficiency measures to be implemented during construction of the structures to reduce energy as usage as well as air emissions.

City of Sausalito Climate Action Plan

In the City of Sausalito Climate Action Plan (CAP), the City compiled existing and potential strategies that the City's government and community can use to address climate change. The CAP focuses on the efforts that Sausalito can take to reduce greenhouse gas emissions and mitigate, to the extent feasible at the local level, the potential impacts of climate change. Specifically, the plan:

- Summarizes the various regulations at the federal, state, and regional levels;
- Incorporates the City's 2005 and 2010 Greenhouse Gas Emission Inventories, which identified sources of greenhouse gas emissions generated by the community and the local government;
- Estimates how these emissions may change over time under a business-as-usual forecast; and
- Provides energy use, transportation, land use, waste, water, waste water, and natural system strategies necessary to minimize Sausalito's impacts on climate change and meet the City's adopted greenhouse gas emissions reduction target of 15 percent below 2005 levels by 2020 (Resolution 5365).

The GHG emissions generated by activities taking place in Sausalito have been quantified in the City of Sausalito Community and Government Operations Greenhouse Inventory for

2016.[32] In 2005, the activities taking place by the Sausalito community resulted in approximately 72,316 MT CO_2e. In 2016, those activities resulted in approximately 60,659 MT CO_2e, which equates to a reduction of 16 percent from 2005 levels. This means that the City has met the State goal to reduce emissions 15 percent below the 2005 baseline by 2020.

Overall, the CAP represents a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b), consistent with the BAAQMD's Approach 2, as promulgated in the 2022 BAAQMD CEQA Guidelines. However, the CAP does not account for future State targets beyond 2020, such as those for years 2030 and 2045. Ultimately, since year 2020 has come and gone, and since it does not account for the future State targets beyond year 2020, the CAP does not provide a basis for analyzing the Project's or Alternative 5's consistency with the State's longer-term GHG targets. Therefore, the BAAQMD's Approach 2 is not an applicable approach for analyzing the Project's nor Alternative 5's potential to conflict with an applicable plan, policy, or regulation of an agency adopted for purposes of reducing GHG emissions. Instead, implementation of the Project and Alternative 5 are analyzed in regards to their potential to meet State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045, as described in further detail below.

ARB 2022 Scoping Plan for Achieving Carbon Neutrality

In accordance with AB 32, the ARB developed the first Scoping Plan in 2008 to outline the State's strategy to achieve 1990 level emissions by year 2020. In May 2014, the ARB released and adopted the *First Update to the Climate Change Scoping Plan* to identify the next steps in reaching AB 32 goals and evaluate the progress that has been made between 2000 and 2012. A newer version of the Scoping Plan was then adopted by the ARB in December 2017 (entitled *California's 2017 Climate Change Scoping Plan*). Lastly, the most recent version of the Scoping Plan was adopted by the ARB in November 2022 (entitled *Final 2022 Scoping Plan for Achieving Carbon Neutrality*), which was designed consistent with the long-term GHG reduction targets embedded in Assembly Bill 1279. Since adoption of the 2008 Scoping Plan and the subsequent updates in 2014, 2017, and 2022, State agencies have adopted programs identified in the plan, and the Legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Building Standards (e.g., CALGreen and the 2022 Building and Energy Efficiency Standards), 33 percent Renewables Portfolio Standard (RPS), and changes in the corporate average fuel economy standards (e.g., Pavley I and California Advanced Clean Cars).

Operational emissions associated with implementing the Project and Alternative 5 would be reduced as regulations are implemented by the ARB and other State agencies to comply with

[32] City of Sausalito. 2018. Community and Government Operations Greenhouse Gas Inventory for 2016. December. Website: https://marinclimate.org/wp-content/uploads/2019/09/Sausalito-2016-GHG-Inventory-Report.pdf. Accessed July 31, 2023.

the statewide GHG reduction targets. These statewide actions are anticipated to reduce operational GHG emissions even further the emissions shown in Table 4-10. For example, both the Project's and Alternative 5's transportation emissions would be expected to decline as vehicle efficiency standards are implemented beyond the California Advanced Clean Cars program and the Low Carbon Fuel Standard is strengthened. Furthermore, CalEEMod does not account for the Governor Newsom's Zero-Emission by 2035 Executive Order (N-79-20), which requires that all new cars and passenger trucks sold in California be zero-emission vehicles by 2035. This is anticipated to substantially reduce the operational emissions associated with passenger vehicles (i.e., mobile emissions) further, over time. Furthermore, both the Project and Alternative 5 would be required to comply with the latest (i.e., 2022) version of the Title 24 standards, which is more stringent than the 2019 Title 24 standards that are modeled in CalEEMod.[33] Therefore, emissions under both the Project and Alternative 5 would continue to decline beyond the buildout year due to regulations that would indirectly affect operational emissions. Moreover, the Title 24 standards are anticipated to be revised again in Year 2025[34] with even stricter energy efficiency and renewable energy requirements for new development, which help to ensure that new development under the Project and Alternative 5 is consistent with the State's GHG reduction goals.

The ARB's *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (the latest version of the Scoping Plan) provides policies that are considered needed to meet the State's mid-term and long-term GHG emissions reduction targets. Specifically, the ARB's *Final 2022 Scoping Plan for Achieving Carbon Neutrality* identifies that it "…lays out the sector-by-sector roadmap for California, the world's fifth largest economy, to achieve carbon neutrality by 2045 or earlier…". The Scoping Plan addresses recent legislation and direction from Governor Newsom, by extending and expanding upon the earlier Scoping Plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045 and adding carbon neutrality as a science-based guide and touchstone for California's climate work. The Scoping Plan is therefore consistent with the Assembly Bill 1279 GHG reduction targets of achieving carbon neutrality by 2045 and reducing anthropogenic emissions to 85 percent below 1990 levels by 2045.

Therefore, recognizing the ARB as an authoritative substantial evidence source in evaluating post-2020 GHG impacts, this analysis also evaluates whether buildout of the Project or Alternative 5 would interfere with the main programs the ARB has identified to support its conclusions that the State is on a trajectory to meet the 2045 GHG target. As provided in **Table 4-11** below, both the Project and Alternative 5 would be consistent with the main programs of the ARB as contained within the *Final 2022 Scoping Plan for Achieving Carbon*

[33] Since the latest version of CalEEMod (v.2022.1) only accounts for the energy efficiency requirements associated with the 2019 version of Title 24, and since there is no well-established methodology for quantifying the reductions in energy consumption associated with the 2022 version of Title 24 over the 2019 version of Title 24, the CalEEMod modeling does not account for the energy efficiency improvements that would be associated with the 2022 (or future, more stringent) versions of Title 24.

[34] See: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency

Neutrality, thereby demonstrating consistency with Assembly Bill 1279. Overall, the Project and Alternative 5 would be consistent with the *Final 2022 Scoping Plan for Achieving Carbon Neutrality*, resulting in the same level of impact and plan conformance.

TABLE 4-11: CONSISTENCY WITH THE ARB'S 2022 SCOPING PLAN FOR THE PROJECT AND ALTERNATIVE 5

SECTOR/SOURCE	CATEGORY/DESCRIPTION	CONSISTENCY ANALYSIS
Area		
SCAQMD Rule 445 (Wood Burning Devices)	Restricts the installation of wood-burning devices in new development.	Mandatory Compliance. Approximately 15 percent of California's major anthropogenic sources of black carbon include fireplaces and woodstoves.[1] Development under the Project or under Alternative 5 would not include hearths (woodstove and fireplaces) as mandated by this rule.
Energy		
California Renewables Portfolio Standard, Senate Bill 350 (SB 350) and Senate Bill 100 (SB 100)	SB 350 requires 50 percent by 2030. SB 100 requires 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	No Conflict. Both the Project and Alternative 5 would utilize electricity and natural gas provided by Pacific Gas & Electric (PG&E) which is required to meet the 2030, 2045, and 2050 performance standards.
All Electric Appliances for New Residential and Commercial Buildings (AB 197)	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	No Conflict. Under the Project and Alternative 5, site-specific plans would be required to demonstrate that only all electric appliances would be installed for residential land uses starting in 2026, consistent with this requirement.
California Code of Regulations, Title 24, Building Standards Code	Requires compliance with energy efficiency standards for residential and nonresidential buildings.	Mandatory Compliance. Future development associated with the Project and Alternative 5 would be required to meet the applicable requirements of the 2022 (or more current) Title 24 Building Energy Efficiency Standards.
California Green Building Standards (CALGreen) Code Requirements	All bathroom exhaust fans are required to be ENERGY STAR compliant.	Mandatory Compliance. Under both the Project and Alternative 5, site-specific construction plans would be required to demonstrate that energy efficiency appliances, including bathroom exhaust fans, and equipment are ENERGY STAR compliant.
	HVAC system designs are required to meet American Society of Heating, Refrigerating	Mandatory Compliance. Under both the Project and Alternative 5, site-specific

	and Air-Conditioning Engineers (ASHRAE) standards.	construction plans would be required to demonstrate that the HVAC system meets the ASHRAE standards.
	Air filtration systems are required to meet a minimum efficiency reporting value (MERV) 8 or higher.	Mandatory Compliance. Under both the Project and Alternative 5, site-specific developments would be required to install air filtration systems (MERV 8 or higher) as part of its compliance with 2022 (or more current) Title 24 Section 401.2, Filters.
	Refrigerants used in newly installed HVAC systems shall not contain any chlorofluorocarbons.	Mandatory Compliance. Under both the Project and Alternative 5, site-specific development must meet this requirement as part of its compliance with the CALGreen Code.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces is required for such vehicles.	Mandatory Compliance. Under both the Project and Alternative 5, site-specific developments would meet this requirement as part of its compliance the CALGreen Code.
Mobile Sources		
Mobile Source Strategy (Cleaner Technology and Fuels)	Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems, and reduction of vehicle miles traveled.	Consistent. Both the Project and Alternative 5 would be consistent with this strategy by supporting the use of zero-emission and low-emission vehicles; refer to CALGreen Code discussion above.
Senate Bill (SB) 375	SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, the ARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.	Consistent. Both the Project and Alternative 5 would comply with Plan Bay Area 2050, and therefore, the Project and Alternative 5 would be consistent with SB 375.
Water		
CCR, Title 24, Building Standards Code	Title 24 includes water efficiency requirements for new residential and non-residential uses.	Mandatory Compliance. Refer to the discussion under 2022 Title 24 Building Standards Code and CALGreen Code, above.
Water Conservation Act of 2009 (Senate Bill X7-7)	The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and	Consistent. Refer to the discussion under 2022 Title 24 Building Standards Code and CALGreen Code, above.

	distribute the water; it also reduces emissions from wastewater treatment.	
Solid Waste		
California Integrated Waste Management Act (IWMA) of 1989 and Assembly Bill (AB) 341	The IWMA mandates that State agencies develop and implement an integrated waste management plan which outlines the steps to divert at least 50 percent of solid waste from disposal facilities. AB 341 directs the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling and sets a Statewide goal for 75 percent disposal reduction by the year 2020.	Mandatory Compliance. Both the Project and Alternative 5 t would be required to comply with AB 341, which requires multifamily residential developments of five units or more to arrange for recycling services. This would reduce the overall amount of solid waste disposed of at landfills. The decrease in solid waste would in return decrease the amount of methane released from decomposing solid waste.

Plan Bay Area 2050: A Vision for the Future

To achieve the ABAG and MTC sustainable vision for the San Francisco Bay Area, the Plan Bay Area 2050 land use concept plan concentrates most new population and employment growth in and around Priority Development Areas (PDAs). Under this Plan, PDAs are described as transit-oriented, infill development opportunity areas within existing communities. As such, both the Project and Alternative 5 would promote implementation of the Plan Bay Area 2050 by identifying infill sites suitable for residential and mixed-use development. Although the Project and Alternative 5 is not directly located within a PDA per se, ABAG allocated its Regional Housing Needs Assessment (RHNA) based on the population and housing growth patterns assumed for Plan Bay Area 2050, and implementation of the Project or Alternative 5 would implement the RHNA and population and household growth patterns that are consistent with Plan Bay Area 2050. In addition, implementation of both the Project and Alternative 5 would reduce VMT per capita in both the residential and employment sectors, as described in further detail in Impact 4.5-52.

BAAQMD 2017 Clean Air Plan

The BAAQMD 2017 Clean Air Plan contains control measures the focus primarily on reducing GHG emissions across the following sectors: stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Both the Project and Alternative 5 would be required to comply with the BAAQMD 2017 Clean Air Plan, including the applicable control measures of the 2017 Clean Air Plan. Future individual projects associated with the Project and Alternative 5 would be required to comply with requirements of the General Plan and Sausalito Municipal Code that aim to reduce GHG emissions in the Planning Area.

Conclusion

The 2022 BAAQMD CEQA Guidelines identifies two potential approaches of significance for GHGs for plan-level projects: (Approach 1) meet State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or (Approach 2) be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). While both the Project and Alternative 5 would be consistent with the relevant planning documents (including the City's CAP, which meets the criteria under State CEQA Guidelines Section 15183.5(b)), the City's CAP does not look beyond year 2020. Therefore, the usage of Approach 2 identified by the BAAQMD would not be appropriate; rather, both the Project and Alternative 5 are analyzed with respect to Approach 1 identified by the BAAQMD. Consistent with Approach 1 as identified by the BAAQMD, both the Project and Alternative 5 are consistent with all applicable planning documents, which helps to ensure consistency with the State's longer-term GHG reduction goals.

Implementation of the Project or Alternative 5 would be consistent with the State's GHG reduction goals, including with all applicable planning documents, thus ensuring that potential new development associated with implementation of the Project or Alternative 5 would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purposes of reducing GHG emissions. The level of impact and compliance with applicable regulatory documents would be similar under Alternative 5 as the Project. Therefore, implementation of both the Project and Alternative will have a ***less-than-significant impact*** under this criterion.

Level of Significance before Mitigation

Less than Significant

Mitigation Measures

None Required

Level of Significance after Mitigation

Less than Significant

Impact 4.5-36	**Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to GHG emissions. (See Impact 3.7-3 for cumulative plus Project impacts related to this topic)**

Climate change is an inherently cumulative issue. As described in the Plan Bay Area 2050 EIR, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) have developed a land use and transportation strategy that meets SB 375 goals and places the Bay Area on a downward trajectory in GHG emissions, but the California Air Resources Board has stated that meeting SB 375 goals alone will not meet statewide goals under California's 2017 Climate Change Scoping Plan. In the absence of

significant new State and local jurisdictional action (e.g., new State regulations, city and county GHG reduction plans targeted to 2030 and beyond), it is not possible to demonstrate that the development in the Bay Area would not impede the State's ability to achieve its SB 32 GHG reduction targets. Therefore, the impact of GHG emissions on the environment is potentially significant.

As described above, GHG emissions related to implementation of Alternative 5 are not confined to a particular air basin but are dispersed throughout the Bay Area and beyond.

Individual projects implemented through Alternative 5 would be required to comply with City ordinances, current General Plan policies, and the adopted CAP to reduce GHG emissions. Additionally, implementation of the overall Alternative 5 would be consistent with the State's GHG reduction goals, including with all applicable planning documents. Therefore, implementation of Alternative 5 will have a less-than-considerable contribution, and the cumulative impact would be ***less than significant***, as it would be under the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Hazards and Hazardous Materials

Information regarding the existing setting, regulatory setting, and thresholds of significance for Hazards and Hazardous Materials impacts can be found on pages 3.8-1 through 3.8-19 in Section 3.8, Hazards and Hazardous Materials, of the Draft EIR.

Impact 4.5-37	**Implementation of Alternative 5 would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (See Impact 3.8-1 for Project impacts related to this topic)**

Implementation of the Project and Alternative 5 would not directly construct new site-specific housing in the City but, through the adoption of new development standards, would facilitate new residential development in order to meet the City's RHNA allocation. Implementation of the Project and Alternative 5 involves the City completing rezoning or adoption of overlay zones to allow development of residential units on identified opportunity sites at densities identified in the Housing Element. Subsequent construction activities to develop the allowed uses could potentially use hazardous materials such as fuels (gasoline and diesel), oils and lubricants, paints and paint thinners, glues, cleaners (which could include solvents and corrosives in addition to soaps and detergents), and possibly pesticides and herbicides. Future residential land uses would not be expected to transport, use, store, or dispose of substantial amounts of hazardous materials.

Likewise, demolition of existing structures could potentially result in release of hazardous building materials (e.g., asbestos, lead paint, etc.). Under both Alternative 5 and the Project, demolition of existing uses would occur on underutilized sites. Under Alternative 5, demolition of the existing fire station on Site 14 and demolition of a portion of Site 52, such as the parking areas and foundations, could be required. However, all new development (construction and operations) would be required to comply with mandatory regulations for hazardous materials adopted by the USDOT, Caltrans, CHP, local CUPA, and Southern Marin Fire Protection District (SMFD), as described in the Regulatory Setting section. Mandatory compliance with regulations would ensure that all impacts for both the Project and Alternative 5 would be less than significant.

Hazardous Material Transportation

As described in the Regulatory Setting discussion of Section 3.8, Hazards and Hazardous Materials, the transportation of hazardous materials on local roadways and along railways is regulated and monitored by multiple agencies. These agencies enforce federal and State regulations regarding transportation of hazardous materials and respond to hazardous material spills and releases that occur on roadways, railway lines, and at railroad crossings. Should an accident occur during transport of hazardous materials, the CUPA, SMFD, and Marin County Sheriff's Department would respond. It is anticipated that materials for site-

specific construction activities under both the Project and Alternative 5 would occur at a similar level.

General Plan Policy HS-1.4: Hazardous Materials, and subprograms HS-1.4.1 through 1.4.10 further minimize the risk of property damage and personal injury resulting from the production, use, storage, disposal and transporting of hazardous materials and waste through a variety of actions including site investigation; require preparation of a Phase I hazardous materials report for all future development or redevelopment projects on sites located within the Marinship area or on sites with a known history of industrial uses; and monitor inspections during the occupancy permit process. Future development under the Project and Alternative 5 would be subject to these General Plan policy and subprogram requirements.

Hazardous Material Use

As noted in the City's General Plan EIR, the SMFD and City of Sausalito Building Division coordinate review of building permits to ensure hazardous materials requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses, and proper hazardous materials storage facilities.

Future construction activities as a result of implementation of the Project or Alternative 5 could use hazardous materials such as fuels (e.g., gasoline and diesel), oils and lubricants, paints and paint thinners, glues, cleaners, and possibly pesticides. The use and handling of hazardous materials during construction activities would occur in accordance with applicable federal, State, and local laws. Once operational, housing sites developed under the Project and Alternative 5 are not expected to transport, use, store, or dispose of substantial amounts of hazardous materials, with the exception of common residential-grade hazardous materials such as household cleaners and paint, among others.

Hazardous Material Disposal

The disposal of hazardous materials is regulated and monitored by the local Certified Unified Programs Agency (CUPA), SMFD, Cal/OSHA, and the DTSC consistent with the requirements of federal, State, and local regulations and policies. At the time of writing of the Draft EIR, sites included as part of the Project and Alternative 5 are not anticipated to include hazardous materials or contamination as Hazardous Waste and Substances Sites (Cortese) List and Geotracker as discussed prior. Development facilitated by the Project and Alternative 5 is not expected to occur on a contaminated site, Opportunity Sites identified under the Project and Alternative 5 do not appear on the Cortese List or Geotracker database list of contaminated sites. Regardless, development facilitated by the Project and Alternative 5 will be evaluated for project-specific and site-specific impacts related to Government Code Section 65962.58 at the time they are proposed, which would include transport of hazardous materials.

In conclusion, while development at the vacant parcels and opportunity sites envisioned by implementation of the Project and Alternative 5 could result in an incremental increase in transportation, use, and disposal of hazardous materials in the City, risks to human health and the environment would be minimized through implementation of General Plan policies and other applicable federal, State, and local regulations. Further, future residential land uses would not be expected to transport, use, store, or dispose of substantial amounts of hazardous materials. Future projects associated with the Project and Alternative 5 would be required to comply with requirements and regulations set forth by the USDOT, Caltrans, CHP, local CUPA, and SMFD. Impacts under Alternative 5 are expected to be similar to the impacts under the Project because the same type of development is proposed, and the two additional sites under Alternative 5 do not appear on lists of known contaminated sites. Therefore, the transportation, use, and disposal of hazardous materials would create ***less-than-significant*** impacts to the environment for the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-38 Implementation of Alternative 5 would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (See Impact 3.8-2 for Project impacts related to this topic)

Implementation of the Project or Alternative 5 would not directly construct new housing in the City but, through the adoption of new development standards, they would facilitate new residential development on specific sites in order to meet the City's RHNA allocation. Construction activities have the potential to release potentially hazardous soil-based materials into the environment during site grading and excavation operations. Likewise, demolition of existing structures on the nonvacant Opportunity Sites and Inventory Sites could potentially result in release of hazardous building materials (e.g., asbestos, lead paint, etc.). Demolition of the existing fire station on Site 14 and some demolition of parking areas and foundations on Site 52 could be required under Alternative 5.

As noted in Impact 4.5-30, compliance with mandatory regulations would reduce potential impacts to a less-than-significant level, and General Plan policies and programs would further reduce potential impacts and ensure that they are less than significant for both the Project and Alternative 5. General Plan Policy HS-1.4, Hazardous Materials, and subprograms HS-1.4.1 through 1.4.10 further minimize the risk of property damage and personal injury

resulting from the production, use, storage, disposal and transporting of hazardous materials and waste through a variety of actions including site investigation; require preparation of a Phase I hazardous materials report for all future development or redevelopment projects on sites located within the Marinship area or on sites with a known history of industrial uses; and monitor inspections during the occupancy permit process.

To prevent and reduce hazardous condition to below a level of significance, existing local, State, and federal law, including those listed in the Regulatory Setting in Section 3.8, Hazards and Hazardous Materials, will be enforced at all construction sites. For example, compliance with existing regulations would ensure that construction workers and the general public are not exposed to any risks related to hazardous materials during demolition and construction. Cal/OSHA regulations concerning the use of hazardous materials, including requirements for safety training, exposure warnings, availability of safety equipment, and preparation of emergency action/prevention plans will be complied with. All contaminated waste must be collected and disposed of at an appropriately licensed disposal or treatment facility.

Future development at the vacant parcels and opportunity sites (including redevelopment of existing developed sites) in accordance with the sites identified by the Project and Alternative 5 must comply with the California Code of Regulations. Title 8 of the California Code of Regulations, which establishes Cal/OSHA requirements related to public and worker protection. Topics addressed include materials exposure limits, equipment requirements, protective clothing, hazardous materials, and accident prevention. Construction safety and exposure standards for lead and asbestos are set forth in Title 8. Title 17 of the California Code of Regulations, which establishes regulations relating to use and disturbance of materials containing naturally occurring asbestos. Soil excavated during construction is regulated under Title 22 of the California Code of Regulations. The local CUPA is responsible for ensuring that the California Code of Regulations and all other programs related to hazardous materials are implemented during construction activities.

As described in Section 3.9, Hydrology and Water Quality, future development under the Project and under Alternative 5 that disturbs one acre or more of soil, or that is part of a common plan of development that disturbs one acre or more of soil, must obtain permit coverage under the Construction General Permit by filing a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP) with the RWQCB prior to commencement of construction. For development under the Project or Alternative 5, the SWPPP must describe the site, facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion, maintenance responsibilities, and non-stormwater management controls. The Best Management Practices in the SWPPP include measures to prevent spills and require on-site materials for cleanup.

Compliance with, implementation of, federal, State, and local policies during future construction activities under both the Project and Alternative 5 would ensure that future

development would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. The impact under Alternative 5 would be similar to that under the Project. Therefore, impacts would be ***less than significant*** for both the Project and Alternative 5**.**

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-39	**Implementation of Alternative 5 would not result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school. (See Impact 3.8-3 for Project impacts related to this topic)**

As discussed in Section 3.13, Public Services and Recreation, Sausalito is served by public and private schools, including three private preschools. Given the distribution of schools in the City and the City's small size, it is probable that future development and redevelopment associated with both the Project and Alternative 5, which may involve hazardous emissions or handling of hazardous materials and wastes, may occur within 0.25-mile of an existing or future school. However, residential land uses do not typically involve the storage or usage of substantial quantities of hazardous materials, and thus, implementation of the Project and Alternative 5 would not result in a substantial increase of hazardous materials located near schools, in operational times (opposed to constructions phases). The additional sites considered under Alternative 5, Opportunity Site 14 and Opportunity Site 52, are not within 0.25-mile of an existing school.

As described under Impacts 4.5-37 and 4.5-38, development facilitated by both the Project and Alternative 5 would be required to comply with regulations related to hazardous materials, including those codified in Programs HS-1.4.1 through 1.4.10, in order to protect sensitive land uses from exposure to hazardous materials. In particular, the City of Sausalito Building Division coordinates review of building permits to ensure hazardous materials use requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses, and proper hazardous materials storage facilities, as discussed in the General Plan EIR. Separation between hazardous materials and sensitive land uses could pose to be a challenge for the Project and Alternative 5, as much of the potential development and construction associated with both the Project and Alternative 5 could occur within residential, and other sensitive land use, areas. However, future site-

specific development (including redevelopment of existing developed sites) associated with implementation of the Project and Alternative 5 would be required by the local CUPA to store, manage, and dispose of the materials in accordance with the Unified Program. The severity of impacts under Alternative 5 would be similar to those under the Project. Therefore, impacts would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-~~33~~40 Implementation of Alternative 5 would not result in development on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.58 and, as a result, create a significant hazard to the public or environment. (See Impact 3.8-4 for Project impacts related to this topic)

As discussed in the Existing Setting in Section 3.8, Hazards and Hazardous Materials, historical uses in Sausalito include a train and ferry system, as well as significant ship building facilities. Deposition of hazardous materials has been found in some areas of Sausalito where these facilities operated, including Dunphy Park, which is an old burn dump site. In addition, an EnviroStor search indicated that two locations have land use restrictions because of past contamination (South Pacific Division Laboratory and Galilee Harbor Parcel 1); neither of these locations are included as an Opportunity Site or Inventory Site under the Project or Alternative 5. Opportunity sites identified as part of the Project and Alternative 5 are not to anticipated to be contaminated, as no Opportunity Sites or Inventory Sites under either the Project or Alternative 5 are identified on existing Cortese and Geotracker list records. Development facilitated by the Project and Alternative 5 is not expected to occur on a contaminated site, as neither the South Pacific Division Laboratory nor the Galilee Harbor Parcel 1 is included in the Project or Alternative. Regardless, development facilitated by the Project and Alternative 5 will be evaluated for site-specific impacts related to Government Code Section 65962.5 at the time future projects are proposed under the Project or Alternative 5, in accordance with DTSC requirements.

As discussed in Impacts 4.5-37, 4.5-38, and 4.5-39, and the Regulatory Setting in Section 3.8, Hazards and Hazardous Materials, any development on a contaminated site would be required to comply with mandatory regulations, which would ensure it does not create a significant hazard to the public or the environment. This requirement would apply equally to future development under the Project or under Alternative 5. While implementation of

neither the Project nor Alternative 5 anticipates developing on contaminated sites, the generally close proximity of these contaminated sites to residential areas calls for adherence local, State, and federal regulations.

For instance, Cal/EPA is authorized by the USEPA to enforce and implement certain federal hazardous materials laws and regulations. The DTSC, a department of the Cal/EPA, protects California and Californians from exposure to hazardous waste, primarily under the authority of the RCRA and the California Health and Safety Code. The DTSC requirements include the need for written programs and response plans. The DTSC programs include dealing with aftermath clean-ups of improper hazardous waste management, evaluation of samples taken from sites, enforcement of regulations regarding use, storage, and disposal of hazardous materials, and encouragement of pollution prevention.

The General Plan contains policies and programs to address the inadvertent discovery of hazardous materials on project sites, which would apply equally to the Project and Alternative 5. Program HS-1.4.2 requires that subsurface contamination investigations at potentially contaminated sites be conducted prior to development approval. Program HS-1.4.6 requires, at minimum, a Phase 1 hazardous materials assessment for all future development or redevelopment projects on sites located within the Marinship area or on sites with a known history of industrial uses. Future development anticipated by the Project and Alternative 5 within the Marinship area or on sites with a known history of industrial uses or located on a contaminated site would be subject to these General Plan policy and program requirements.

As described under Impact 4.5-37, should any hazardous materials be inadvertently encountered during construction activities from development facilitated by the Project or Alternative 5, the handling, transportation, and disposal of hazardous materials would be required to comply with the requirements and regulations set forth by the USDOT, Caltrans, CHP, CPUC, Hazardous Materials Compliance Division (HMCD), and Marin County Hazardous & Solid Waste Management – Joint Powers Authority. The level of impact under Alternative 5 would be similar to that under the Project. Therefore, impacts would be ***less than significant*** for the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-41 Implementation of Alternative 5 would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (See Impact 3.8-5 for Project impacts related to this topic)

As described in the Regulatory Setting of Section 3.8, Hazards and Hazardous Materials, Marin County has developed an Emergency Operations Plan (EOP) that describes overall responsibilities of federal, State, County, and City for protecting life and property and assuring overall wellbeing of the population. The SMFD conducts evacuation exercises annually to prepare for emergency situations. Evacuations in the City are an emergency support function that local law enforcement organizes and coordinates with the SMFD.[35] The EOP is maintained on a regular basis by the County Sheriff's Office of Emergency Services. As such, as development occurs under the Project or Alternative 5, the EOP can be modified to reflect new growth within the City. Therefore, impacts for both the Project and Alternative 5 would be less than significant.

The Sausalito Community Safety/Disaster Preparedness Committee also publishes an annual Disaster Preparedness: Citizen's Guide and provides disaster preparedness training to City departments and residents.

Development accommodated in connection with the Project and Alternative 5 would result in an incremental increase in new residential uses, and therefore, an incremental increase in demand for emergency response services. Development under the Project is expected to accommodate approximately 1,147 new residential dwelling units, increasing the City's population by approximately 1,962 residents. Alternative 5 would accommodate 1,133 dwelling units, resulting in an increase in population of approximately 1,938 residents. Although the difference is small, Alternative 5 would have slightly less demand for emergency response services because the number of new residents would be smaller than under the Project.

Emergency Evacuation Travel Time Analysis

As described in Section 3.13, Public Services and Recreation, of this DEIR, the City has existing policies and practices in place that require emergency access to be analyzed during development project entitlement reviews under both the Project and Alternative 5. However, development and growth in the City associated with both the Project and Alternative 5 would result in an incremental increase in demand and capacity for emergency evacuation within the Planning Area.

To understand how the Project may affect congestion and travel times in the city, Kittelson & Associates developed and analyzed evacuation scenarios to represent situations in which residents, employees, and visitors to the Plan area would have to evacuate. The evacuation scenarios considered for Alternative 5 would be the same as those under the Project. It is

[35] City of Sausalito General Plan Environmental Impact Report. 2021. Section 3.8 Hazards.

anticipated that the same primary and secondary evacuation routes would be used, but that there would be slightly fewer cars and people evacuating because there would be fewer housing units constructed under Alternative 5 as compared to the Project.

The City of Sausalito is located in Marin County, north of San Francisco, bounded by Marin City to the northwest and Richardson Bay on the east. Communities and businesses are oriented along Bridgeway. Evacuation trips from Sausalito are most likely to use Highway 101 or Bridgeway to travel north or south. Highway 101, also known as Redwood Highway, has four lanes in each direction within Sausalito. Near Sausalito, interchanges are present at:

- Donahue Street (north of Sausalito)
- Rodeo Avenue
- Monte Mar Drive
- Alexander Avenue (south of Sausalito)

The routes that would be used in the event of an evacuation include Bridgeway, Spencer Avenue, Alexander Avenue, Highway 101, Donahue Street, and Shoreline Highway. For persons residing on boats, or persons having access to boats, including the Golden Gate Ferry, evacuation could be potentially taken via Richardson Bay. Bridgeway runs parallel with Highway 101 within Sausalito. It has two lanes in each direction between Bridge Boulevard and Napa Street and has one lane in each direction with a center turn lane in most of the segments between Napa Street and Richardson Street. Opportunity Site 14 is adjacent to the Highway 101 and Monte Mar Drive interchange.

Opportunity Site 52 would be close to Bridgeway, and the primary evacuation route from Site 52 would be Bridgeway. East-west connections to get to Highway 101 or Bridgeway are mainly provided by local routes within Sausalito.

Kittelson modeled evacuations for two emergency scenarios selected based on City staff input to provide general information related to potential evacuation delays that may occur with increased residential development. Through these discussions and the most likely emergency scenarios expected to impact the City, the scenarios identified for evacuation analysis include:

- Wildfire (PM Peak Period)
- Earthquake (PM Peak Period)

These emergency scenarios would also be applied to Alternative 5.

Kittelson & Associates, Inc. prepared a technical memorandum that presents the evacuation analysis methodology and results for the Project. Evacuation capacity analysis was conducted for PM peak period. The results represent the peak period conditions for an evacuation when non-evacuation traffic would be at its highest levels. Kittelson ran two scenarios for this evacuation scenario for the Project:

- No Road Closure - both Highway 101 and Bridgeway remain open during evacuation.
- With Road Closure - the segments of Highway 101 and Bridgeway at the northern part of Sausalito are closed during evacuation.

Similar to the evacuation scenario modeling, both the Project and Alternative 5 would have potential over capacity conditions on several roadways in the City. Specifically, the roadways where volumes are projected to be at or exceed capacity within the evacuation zone for scenarios similar to the Project and Alternative 5 include:

No Road Closure

- Northbound Highway 101 from Donahue Street to Alexander Avenue
- Northbound Bridgeway from Princess Street to Richardson Street
- Northbound Second Street from Richardson Street to Alexander Avenue
- Northbound Alexander Avenue from South Street to Fort Baker Road
- Westbound Monte Mar Drive from Currey Avenue to northbound Highway 101 on ramp

With Road Closure

- Northbound Highway 101on ramp at Bridgeway
- Southbound Monte Mar Drive from northbound Highway 101 on ramp to Spencer Avenue
- Northbound Spencer Avenue from Monte Mar Drive to Wolfback Ringe Road
- Eastbound Rodeo Avenue from northbound Highway 101 ramp to Nevada Street
- Southbound Donahue Street from Highway 101 ramp to Alta Trail (Marin City)

This congestion reflects regular commute congestion in the City. The secondary roadways noted above mainly serve as parallel routes to Highway 101 as well as north-south connections in the City. Evacuating residents are expected to experience a similar level of congestion under Alternative 5 as under the Project. However, there may be some small differences from reducing units at Site 84 and potentially shifting units to Sites 14 and 52. For example, Site 84 is near Bridgeway, which serves as the City's primary evacuation route, and within three-quarters of a mile of Highway 101. Site 14 is also located near a Highway 101 freeway interchange. For evacuation scenarios where Highway 101 is the destination for evacuees, these two sites may perform similarly. In wildfire type evacuation scenarios, Site 14's location in a potentially more fire-prone area could be more constrained than Site 84. With respect to Site 52, comparing evacuation conditions to Site 84 is also likely to be highly variable depending on the type of disaster scenario. Site 52 is farther from Highway 101 than Site 84, so may be more constrained from an evacuation perspective if Highway 101 is the evacuation destination. Conversely, if access becomes limited in the northern portion of Sausalito due to a disaster, Site 52's more southerly location could be less constrained than Site 84.

For the earthquake scenario, it was assumed 75% of the residents will be at home with regards to the shelter-in-place orders and the rest of the people will be evacuated.[36] For modeling the earthquake scenario, it was therefore assumed 25% of the residents and 25% of the employees would evacuate. For each evacuation TAZ/MAZ, Kittelson assigned likely evacuation destinations based on the City of Sausalito's designated emergency evacuation destinations as well as destinations that can accommodate large groups of people. These include locations such as elementary, middle, and high schools, community colleges, parks, and community centers, and would be applicable under both the Project and Alternative 5. Evacuation destinations were assigned based on the location and direction of the evacuation. These destinations are selected for each of the evacuation scenarios with a goal of identifying evacuation travel patterns and congestion throughout the City. The distribution of the destinations is not intended to reflect a precise distribution of the routes that would be taken during an evacuation. The trips were distributed from each of the evacuation zones to each of the destination zones, as appropriate. Under the entire city scenario, the destination zone for this scenario would be the Army Corps of Engineers in the City of Sausalito located at the Bay Model Visitor Center at 2100 Bridgeway.

The model indicates that the level of development anticipated to accommodate the RHNA, such as implementation of the Project or Alternative 5, would result in substantial and immediate over capacity conditions on several roadways in the City, as shown in Figure 3.8-1 and Figure 3.8-2. Specifically, the roadways where volumes are projected to be at or exceed capacity within the evacuation zone under both the Project and Alternative 5 include:

- 2040 Baseline Scenario with Evacuation
    - Northbound Highway 101 from Donahue Street to Alexander Avenue
    - Northbound Bridgeway from Napa Street to Johnson Street
    - Northbound Monte Mar Drive from Spencer Avenue to northbound Highway 101 on ramp
    - Eastbound Spencer Avenue from Monte Mar Drive to Booker Avenue
- 2040 Cumulative Scenario with Evacuation
    - Northbound Highway 101 from Donahue Street to Alexander Avenue
    - Northbound Bridgeway from Napa Street to Turney Street
    - Marinship Way from Bridgeway to Wateree Street
    - Eastbound Wateree Street from Marinship Way to Road 3
    - Northbound Monte Mar Drive from Spencer Avenue to northbound Highway 101 on ramp
    - Eastbound Spencer Avenue from Monte Mar Drive to Prospect Avenue

Traffic forecasts were prepared for the earthquake scenario. The average peak period travel time for all Sausalito trips to the evacuation destination TAZ (800136) in the 2040 baseline

[36] Mike McKinley, Liaison Officer, Northbay All-Hazard Incident Management Team (NBIMT)

scenario with earthquake evacuation scenario would be 5.50 minutes. This average. The average peak period travel time for all Sausalito trips to the evacuation destination TAZ in the 2040 cumulative scenario, which is anticipated to be similar to the Project and Alternative 5, with evacuation would be 5.90 minutes. Under both the Project and Alternative 5, the number of evacuation trips would increase by approximately 17% and the average travel time would increase by approximately 7%. The number of evacuation trips and average travel time increases would be expected to be similar under Alternative 5 as under the Project.

Conclusion

Implementation of the Project or Alternative 5 do not propose alteration of existing roadway patterns and would not introduce any new major roadways or other physical features that would result in inadequate emergency access. Further, development anticipated by the Project and Alternative 5 would be located on sites either developed, vacant, and/or underutilized and are not expected to inhibit existing emergency access as they do not propose alteration of existing roadway patterns. An incremental increase in development could occur in the City under both the Project and Alternative 5, which may require the installation of new infrastructure, such as roads and fire access roads; however, any new infrastructure would be limited to serving new development and would be reviewed by the City of Sausalito during project-specific site plan review to ensure adequate emergency access is provided.

Development and growth in the City under the Project and Alternative 5 would result in an incremental increase in demand for emergency evacuation routes within the City. However, the demand for emergency services and evacuation routes may be slightly less under Alternative 5 as fewer residential units would be constructed. As noted in Section 3.16, Wildfire, the development facilitated by the Project, and also by Alternative 5, would be served by existing emergency evacuation routes, which would be expected to serve projected growth. Since Alternative 5 would result in slightly less growth than the Project, these evacuation routes would also have sufficient capacity to accommodate growth under Alternative 5. General Plan Policy HS-2.4, Access for Emergency Vehicles, underscores the importance of maintaining adequate access by requiring the City to provide and maintain adequate access for emergency vehicles and equipment, particularly fire-fighting equipment. Proactive measures may be necessary, determined by the City of Sausalito during project-specific site plan review proposed under the Project or Alternative 5, to encourage efficient measures, including ensuring adequate width of roadways, and not siting critical egress and ingress within flood zones to the extent possible. General Plan Program HS-2.5.1, Priority Undergrounding, prioritizes the undergrounding of those overhead utilities which are at risk of hindering the movement of emergency vehicles and other Health and Safety risks such as PCBs, falling wires, and electromagnetic fields.

The City has existing inter-jurisdictional programs that are already in place, and the City focuses on maintaining and enhancing emergency vehicle access and evacuation routes to protect life and property in the event of emergency. Exact emergency evacuation routes and evacuation timing would be highly dependent on the type of emergency experiences, which parts of the city are evacuated, and whether there are road closures. The effects of emergency evacuation under Alternative 5 would be similar to those under the Project, as some units would be moved closer to Highway 101 (Site 14) and some units would be moved farther away from Highway 101 (Site 52). Therefore, impacts related to emergency evacuation would be ***less than significant*** for the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-42 Development facilitated by implementation of Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to hazards and hazardous materials. (See Impact 3.8-6 for cumulative plus Project impacts related to this topic)

This analysis evaluates whether impacts of implementing Alternative 5, together with impacts of cumulative development, would result in a cumulatively significant impact with respect to hazards and hazardous materials. This analysis then considers whether incremental contribution of impacts associated with implementation of Alternative 5 would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of significance. The geographic context for this analysis includes Sausalito, Marin City, Mill Valley, Tiburon, Belvedere, and other adjacent unincorporated areas.

Hazards and Hazardous Materials
Cumulative projects would be subject to the requirements and regulations set forth by the USDOT, Caltrans, CHP, the local CUPA, and SMFD related to transport, use, and disposal of hazardous materials. Accordingly, cumulative development would not result in physical changes that would result in a significant environmental effect. Cumulative projects will also be required to implement a SWPPP and comply with the California Code of Regulations during construction, site grading, excavation operations, and building demolition. For these reasons cumulative projects would have a ***less-than-significant*** effect under Alternative 5 and the Project.

Moreover, the incremental contribution to less-than-significant cumulative impacts resulting from implementation of Alternative 5 would not be significant. Development resulting from future buildout of Alternative 5 implementation is largely the same as what was already evaluated and disclosed as part of the 2021 General Plan EIR and will be subject to both proven continuing policies and enhanced policies to reduce impacts related to hazards and hazardous materials. As previously discussed, development facilitated by Alternative 5 would result in an incremental increase in new residential uses which could, while trivial, result in an incremental increase in transportation, use, and disposal of hazardous materials. Potential impacts would be reduced to below a level of significance, as discussed above, because construction must comply with the California Code of Regulations and implement a SWPPP to prevent hazardous materials spills and protect public safety. To ensure a less-than-significant contribution to cumulative impacts, development consistent with Alternative 5 will be required to implement all applicable policies during the design review process.

Additionally, as previously stated, development under Alternative 5 would be required to comply with requirements and regulations set forth by the USDOT, Caltrans, CHP, the local CUPA, and SMFD related to transport, use, and disposal of hazardous materials. Accordingly, development under Alternative 5 would not result in physical changes that would incrementally contribute to a significant environmental effect. For these reasons, Alternative 5's contribution to cumulative impacts would be considered ***less than significant***, similar to the Project.

Emergency Response and Evacuation Plans

Cumulative impacts related to emergency response and evacuation plans would be less than significant. The SMFD conducts evacuation exercises annually to prepare for emergency situations. Evacuations in the City are an emergency support function that local law enforcement organizes and coordinates with the SMFD.[37] The MCM LHMP covers all incorporated cities in Marin County, as well as unincorporated areas. The LHMP addresses emergency preparedness, mitigation, warnings, communications, responses, and recovery. The LHMP also identifies resources, information, and strategies for reducing risk from natural hazards. In addition, Marin County has an EOP that is regularly updated. Adjacent jurisdictions also have emergency response plans and emergency evacuation plans. Furthermore, larger regional and statewide resource areas are regulated by State agencies to address larger-scale, statewide issues. For these reasons, cumulative impacts associated with emergency response and evacuation plans are ***less than significant*** for Alternative 5 and the Project.

Moreover, Alternative 5's incremental contribution to these less-than-significant cumulative impacts would not be significant. To ensure a less-than-significant contribution to cumulative impacts, development under Alternative 5 will be required to implement all applicable policies during the design review process. As the City receives development applications for

[37] City of Sausalito General Plan Environmental Impact Report. 2021. Section 3.8 Hazards

subsequent development, those applications will be reviewed by the City of Sausalito for compliance with the policies and programs of the General Plan and Municipal Code related to emergency response plans and emergency evacuation plans. Additionally, new development under Alternative 5 would be considered in the context of the EOP and is not expected to impair implementation of or physically interfere with the EOP. Therefore, Alternative 5's contribution to cumulative impacts would be considered ***less than significant,*** as it would be under the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Hydrology and Water Quality

Information regarding the existing setting, regulatory setting, and thresholds of significance for Hydrology and Water Quality impacts can be found on pages 3.9-1 through 3.9-15 in Section 3.9, Hydrology and Water Quality, of the Draft EIR.

Impact 4.5-43 Implementation of Alternative 5 would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. (See Impact 3.9-1 for Project impacts related to this topic)

Construction Activities

Although no specific development projects are proposed, or would be approved through adoption of the Project or Alternative 5, it is reasonably anticipated that future projects under both the Project and Alternative 5 would involve grading, excavation, and removal of vegetative cover that have the potential to result in runoff that contains sediment and other pollutants that could degrade surface and groundwater quality if not properly controlled.

Sources of potential pollution associated with future construction activities under the Project and Alternative 5 include fuel, grease, oil and other fluids, concrete material, sediment, and litter. These pollutants have the potential to result in impacts due to chemical contamination from construction activities and materials that could pose a hazard to the environment or degrade water quality if not properly managed and controlled.

Future development under the Project and Alternative 5 that disturbs one acre or more of soil or that is part of a common plan of development that disturbs one acre or more of soil must obtain permit coverage under the Construction General Permit by filing a NOI and SWPPP with the RWQCB prior to commencement of construction. The SWPPP must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of individual construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary.

Additionally, the General Plan includes policies and programs for areas with high susceptibility to erosion and protect water quality, which would apply equally to the Project and Alternative 5. Program EQ-4.1.1 requires the city to continue to participate in MCSTOPPP. Program EQ-4.1.3 requires the city to coordinate with the RBRA in implementing the adopted water pollution control program contained in the Richardson Bay Special Area Plan.

The Sausalito Municipal Code contains rules and regulations to protect water quality during construction, which would apply equally to the Project and Alternative 5. Chapter 11.17 calls for prohibiting, reducing, preventing, controlling, and responding to spills to the maximum

extent practicable. Additionally, Chapter 11.18 establishes a funding source for urban runoff pollution prevention ordinance enforcement; maintenance, repair, and improvement of stormwater drainage facilities; and provide other clean stormwater activities. Finally, the rules and regulations of the Municipal Code that address soil erosion, such as Chapter 17.08, also protect water quality during construction.

Although Alternative 5 would develop two additional sites beyond that anticipated under the Project, both sites have been disturbed by existing development, and construction impacts under Alternative 5 would be substantially similar to those under the Project. Compliance with mandatory NPDES permit requirements, adherence to the Sausalito Municipal Code, and implementation of General Plan policies and programs would ensure that impacts related to water quality degradation from construction activities would be ***less than significant*** for both the Project and Alternative 5.

Dewatering

Construction activities associated with future development under the Project and Alternative 5, including excavation and trenching, may encounter shallow groundwater. If shallow groundwater is encountered on an individual project site, dewatering of the excavation or trenching site may be required. If improperly managed, these dewatering activities could result in discharge of contaminated groundwater. In accordance with the General Waste Discharge Requirements for Extracted Groundwater from Structural Dewatering Requiring Treatment in the San Francisco Bay Region (Order No. R2-2012-0060; General NPDES Permit No. CAG912004), any contaminated groundwater encountered under the Project or Alternative 5 would be treated prior to discharge or disposed of at an appropriate disposal facility or wastewater treatment plant. Also, discharges of dewatered groundwater to a storm drain must be conducted in a manner that complies with the RWQCB San Francisco Bay Region Order No. R2-2009-0074, MRP.

The General Plan includes Program EQ-4.1.8 which requires compliance with NPDES and State pollution discharge programs.

The Sausalito Municipal Code contains rules and regulations to prevent the discharge of pollutants to waters of the United States or the ocean, which would include any contaminated groundwater encountered during construction anticipated under the Project and Alternative 5. Chapter 11.17 is intended to prevent or minimize discharges other than storm runoff to storm drains or watercourses.

Although Alternative 5 would develop two additional sites beyond that anticipated under the Project, dewatering impacts under Alternative 5 would be substantially similar to those under the Project. Compliance with mandatory NPDES permit requirements and adherence to the Sausalito Municipal Code would ensure that impacts related to water quality degradation from the discharge of dewatered groundwater would be ***less than significant*** for both the Project and Alternative 5.

Operation

Future development in the city under both the Project and Alternative 5 could add additional areas of impervious surfaces within the Planning Area and could therefore increase the volume of pollutants that are typically associated with urban runoff into the stormwater. These pollutants can include sediments, petroleum hydrocarbons, pesticides, fertilizers, and heavy metals such as lead, zinc, and copper that tend to build up during the dry months of the year. Precipitation during the early portion of the wet season (generally from November to April) washes away most of these pollutants, resulting in high pollutant concentrations in the initial wet weather runoff. This initial runoff is referred to as the "first flush" of storm events. Subsequent periods of rain would result in less concentrated pollutant levels in the runoff.

The amount and type of runoff generated by the various future housing projects facilitated by the Project and Alternative 5 could potentially be greater than under existing conditions. An increase in impervious surfaces could result in a corresponding increase in urban runoff pollutants and first flush roadway contaminants, as well as an increase in nutrients and other chemicals from landscaped areas. These constituents could result in water quality impacts to on-site and off-site drainage flows to area waterways.

The General Plan includes policies and programs specifically designed to address water quality at operation, which would apply equally to the Project and Alternative 5. Program EQ-4.2.3 requires that new developments or major renovations incorporate pervious surfaces to percolate stormwater runoff into groundwater. Similarly, Program EQ-4.2.4 envisions modifications to the Zoning Ordinance to ensure that pervious surfaces are encouraged in new development. Program EQ-4.2.5 requires the city to increase outreach on use of toxin-free landscape management practices. Program EQ-4.2.6 requires that post-development peak stormwater runoff discharge rates do not exceed the estimated pre-development rate when permitting new development or substantial remodels. In addition, dry weather runoff from these projects should not exceed the pre-development baseline flow rate. Policy EQ-4.3 and Program HS-1.7.4 aim to ensure natural integrity of creeks and/or drainageways are maintained not only as riparian habitat and wildlife corridors, but also to reduce flood hazards. The Sausalito Municipal Code also contains rules and regulations to protect water quality at operation, which would apply equally to the Project and Alternative 5. Chapter 11.17 is intended to prevent or minimize discharges other than storm runoff to storm drains or watercourses. The Ordinance requires that newly developed or redeveloped lands maintain pre-development stormwater runoff rates and prevent stormwater pollution where possible through LID design. LID uses site design and stormwater management to maintain the site's predevelopment runoff rates and volumes. The goal of LID is to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain runoff close to the source of rainfall.

Future development projects proposed under the Project and Alternative 5 would also be required to comply with the Clean Water Act and regulations enforced by the RWQCB. In

addition, future projects under the Project and Alternative 5 would comply with requirements of the Sausalito Municipal Code and Urban Runoff Pollution Prevention Ordinance, and the General Plan policies and programs related to water quality. Although Alternative 5 would develop two additional sites beyond that anticipated under the Project, impacts under Alternative 5 would be substantially similar to those under the Project. Therefore, the operation of future development facilitated by the Project and Alternative 5would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As such, implementation of the Project and Alternative 5 would result in a ***less than significant*** impact relative to this topic.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-44 Implementation of Alternative 5 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. (See Impact 3.9-2 for Project impacts related to this topic)

Development of housing sites associated with the Project and Alternative 5 could lead to an increased demand for water. As described in Section 3.15, Utilities and Service Systems, the City of Sausalito receives its water supply from the MMWD, which has studied the potential for municipal groundwater use since the 1970s and has determined that the potential for municipal groundwater use within the boundaries of the MMWD service area is very limited due to limited production capabilities, water quality constraints, and potential water rights issues. As a result, groundwater is not currently or planned to be used as a municipal water supply source by the MMWD, though private groundwater wells are used in portions of the MMWD service area.[38] All properties that would be developed under the Project or Alternative 5 are to be served by public water services and would not require onsite groundwater pumping. Alternative 5 would result in slightly fewer residential units as compared to the Project and would have even less of an impact on groundwater supplies than the Project.

Subsequent development of housing sites under both the Project and Alternative 5 could result in an increase in impervious surfaces, which could reduce rainwater infiltration.

[38] Marin Municipal Water District (MMWD). 2016. 2015 Urban Water Management Plan (UWMP), page 6-3.

Although Alternative 5 would develop two more Opportunity Sites than the Project, both Site 14 and Site 52 are already developed with impervious surfaces, and development on those sites would not substantially alter the amount of runoff from those sites. There are three groundwater basins identified in DWR's Bulletin 118 that are at least partially within the Marin Municipal Water District service area. These three basins include Ross Valley, San Rafael Valley, and part of the Novato Basin. All three basins are categorized by the California Statewide Groundwater Elevation Monitoring (CASGEM) program as very low priority basins. None of these basins are within the City of Sausalito.

Limited groundwater resources exist within the Planning Area and according to the DWR, there is no delineated groundwater basin in the Sausalito Planning Area. Implementation of the Project and Alternative 5 would not interfere with groundwater recharge or impede groundwater management, and their level of impact would be similar. Therefore, this impact is considered ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-45	**Implementation of Alternative 5 would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site. (See Impact 3.9-3 for Project impacts related to this topic)**

Future development under the Project and Alternative 5 would be completely located within the city limits and generally in existing locations identified for future development or re-development. Future development under both the Project and Alternative 5 would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities that could alter the existing drainage pattern on a site anticipated for development by the Project or Alternative 5. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. This could result in an increase in stormwater runoff and the potential to cause erosion or sedimentation in drainage swales and creeks. However, none of the future development facilitated by the Project or Alternative are anticipated to require the alteration of the course of an existing stream or river.

Construction activities that may occur under the Project and Alternative 5 that disturb one or more acres of land surface are subject to the Construction General Permit adopted by the

State Water Board. Compliance with the permit requires each qualifying development project to file an NOI with the State Water Board. For development under the Project or Alternative 5, the SWPPP for individual sites must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of individual construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary.

Chapters 11.17 and 11.18 of the Sausalito Municipal Code set forth rules and regulations to prevent stormwater pollution and reduce pollutants from entering the storm drainage system, which would apply equally to the Project and Alternative 5. For example, Chapter 11.17 requires construction activities to implement BMPs that reduce stormwater pollutants from exiting an individual project site. Chapter 17.08 sets forth rules and regulations to control excavation, grading, and earthwork construction on land, which would minimize soil erosion during construction.

The Sausalito Municipal Code Chapter 11.17 requires an erosion and sediment control plan (ESCP) for any project:

> (A) Subject to a grading permit under Chapter 17.08 SMC, Excavations Generally;
>
> (B) Subject to a building permit or other permit that has the potential for significant erosion and/or significant non-storm water discharges of sediment and/or construction site waste;
>
> (C) As required by the City considering factors such as whether the project involves hillside soil disturbance, rainy season construction, construction near a creek or an intermittent or ephemeral drainage way, or any other condition or construction site activity that could lead to a non-storm water discharge to a storm drain if not managed by effective implementation of an ESCP.

In addition to compliance with mandatory Clean Water Act and Sausalito Municipal Code requirements, adherence to General Plan policies and programs would further reduce the potential for erosion and off-site siltation from construction-related soil disturbance for both the Project and Alternative 5. For instance, General Plan Program EQ-4.2.6 requires that new development and substantial remodels demonstrate that post development stormwater discharge does not exceed the pre-development rate, ensuring that the potential for erosion would not be exacerbated but would rather be reduced. Program HS-1.2.1 will result in a detailed map that will identify, in part, locations identified as erosion hot spots, while Program HS-1.2.6 directs Sausalito to develop a Hillside Ordinance, to include restrictions and heightened review for development on steep slopes that could result in the potential for erosion during construction, which would be important for Site 14 under Alternative 5 given the site's topography. Policy LU-6.4 and Policy W-3.3, will further protect against erosion by

requiring the preservation of the existing shoreline of Richardson Bay as open shoreline and natural habitat. Alternative 5 would not develop any additional sites along the shoreline as compared the Project. However, due to the hilly nature of the city, site runoff during individual construction activities under both the Project and Alternative 5 could create erosion. Therefore, the impact is ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-45 Implement Mitigation Measure 3.9-3.

> **MM 3.9-3** Prior to the issuance of a grading permit, the project applicant shall prepare and implement a preliminary grading plan and an erosion and sediment control plan (ESCP) and submit it to the City prior to ground disturbance. At a minimum, the ESCP shall include:
>
> a. Description of the proposed project and soil disturbing activity.
>
> b. Site specific construction-phase best management practices (BMPs) that address grading, erosion, and sediment control and that ensure that there would not be an increase in off-site project runoff and drainage.
>
> c. Rationale for selecting the BMPs.
>
> d. List of applicable outside agency permits associated with the soil disturbing activity, such as: Construction General Permit (CGP); Clean Water Act Section 404 Permit; Clean Water Act Section 401 Water Quality Certification; Streambed/Lake Alteration Agreement (1600 Agreements).
>
> e. If the project requires coverage under the CGP issued by the State Water Resources Control Board (SWRCB), permit registration documents must be filed with the SWRCB for said coverage and a copy of the Waste Discharge Identification Number shall be submitted to the City prior to issuance of a permit for construction. The applicant may submit the Storm Water Pollution Prevention Plan (SWPPP) required by the General Construction Activity Stormwater Permit in lieu of the ESCP provided it meets the requirements of the ESCP.
>
> f. Financial security may be required to ensure that temporary measures to control storm water pollution are implemented and maintained during construction and after construction for a period determined by the agency. Financial security shall consist of an irrevocable letter of credit, cash deposit, or performance bond as determined by the agency.

g. When any work is being done contrary to the provisions of City Municipal Code Chapter 11.17, the authorized enforcement official shall order the work stopped by notice in writing served on any persons engaged in doing or causing the work to be done. Such work shall stop until the authorized enforcement official authorizes the work to proceed. This remedy is in addition to and does not supersede or limit any and all other remedies, both civil and criminal, provided in the City of Sausalito Municipal Code.

h. Implementation of an approved ESCP shall be a condition of the issuance of a building permit, a grading permit, or other permit issued by the City for a project subject to this section. The ESCP shall be implemented year round and must be updated to reflect changing conditions on the project site. Any modifications to the ESCP shall be submitted to the City for review and approval.

Level of Significance after Mitigation
Less Than Significant

Implementation of Mitigation Measure 4.5-45 would require individual projects proposed under the Project and Alternative 5 to implement a ESCP that includes BMPs to ensure that there would not be an increase in runoff and sediment from a project site. This mitigation, applicable to both the Project and Alternative 5, would ensure that individual projects developed under the Project or Alternative 5 would not alter off-site drainage patterns or create siltation downhill. The impact for Alternative 5 would be similar to that under the Project, and the impact would be ***less than significant*** for both the Project and Alternative 5.

Impact 4.5-46 Implementation of Alternative 5 would not 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 that would result in flooding on- or off-site. (See Impact 3.9-4 for Project impacts related to this topic)

New development or redevelopment of rezoned areas following implementation of the Project or Alternative 5 could potentially incrementally increase the total impervious area within Sausalito and increase stormwater runoff, which could result in flooding as some development would occur on vacant undeveloped sites. Although Alternative 5 would develop two more Opportunity Sites than the Project, both Site 14 and Site 52 are already developed with impervious surfaces, and development on those sites would not substantially increase the possibility of localized flooding. However, implementation of General Plan policies and programs and adherence to the requirements of the Sausalito Municipal Code would maximize the on-site infiltration capacity for new development and redevelopment projects proposed under the Project and Alternative 5, and would minimize

the off-site runoff that would leave those individual project sites. For example, Chapter 11.18 establishes a regulatory fee for clean storm water activities to provide maintenance and repair of the City's storm water drainage facilities, to provide capital improvements to the City's storm drainage system, and to provide other clean storm water activities. Additionally, Chapter 11.17 of the Sausalito Municipal Code may require individual new or re-development projects to include operational stormwater drainage infrastructure that incorporates LID features and BMPs, based on individual site characteristics. Stormwater infrastructure such as rain gardens, bioswales, and retention basins would be designed to retain stormwater on-site and reduce high velocity peak flows that could erode soils, transport pollutants into Richardson Bay and the San Francisco Bay, and lead to flooding.

Policy EQ-4.2 Stormwater Management requires management of flooding, mitigation of hazardous runoff from stormwater, and mitigation of landslides. Program HS-1.12.1 ensures that new developments and substantial remodels in at-risk areas incorporate low-impact, resilient, infrastructure and are protected from potential impacts of flooding from sea level rise and significant storm events. Program EQ-4.2.6 requires that new development and substantial remodels demonstrate that post development stormwater discharge does not exceed the pre-development rate, ensuring that the potential for erosion would not be exacerbated, but would rather be reduced under both the Project and Alternative 5.

For both the Project and Alternative 5, compliance with the General Plan policies and programs, as well as adherence to the Sausalito Municipal Code, would maximize infiltration and rainwater retention, which would in turn reduce stormwater runoff from individual sites. Although Alternative 5 would develop two additional sites beyond that anticipated under the Project, impacts under Alternative 5 would be substantially similar to those under the Project. Therefore, impacts related to flooding, exceedances in stormwater drainage systems, or the creation of substantial additional sources of polluted runoff would be considered ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less Than Significant

Impact 4.5-47 **Implementation of Alternative 5 would not 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. (See Impact 3.9-5 for Project impacts related to this topic)**

Under the Project and Alternative 5, the buildout of housing sites that are currently vacant and undeveloped could incrementally increase the total impervious area within Sausalito and increase stormwater runoff, which could result in flooding, exceed stormwater drainage facility capacity, or create additional sources of polluted runoff. Although Alternative 5 would develop two additional sites beyond that anticipated under the Project, both Site 14 and Site 52 are developed with impervious surfaces, and the redevelopment of those Opportunity Sites would not increase the amount of impervious surface.

However, as described previously, implementation of General Plan policies and programs such as EQ-4.2.6 and adherence to the requirements of the Sausalito Municipal Code would maximize the on-site infiltration capacity for new development and redevelopment projects and would minimize the off-site runoff that would leave those project sites. These policies and programs would apply equally to the Project and Alternative 5. Chapter 11.17 of the Sausalito Municipal Code requires new or re-development projects to include operational stormwater drainage infrastructure that incorporates LID features and BMPs. Stormwater infrastructure such as rain gardens, bioswales, and retention basins would be designed to retain stormwater on-site and reduce high velocity peak flows that could erode soils, transport pollutants into Richardson Bay and the San Francisco Bay, and lead to flooding. Program EQ-4.2.6 requires that new development and substantial remodels demonstrate that post development stormwater discharge does not exceed the pre-development rate, ensuring that the potential for additional polluted runoff volumes would not be exacerbated.

Compliance with the General Plan policies and programs, as well as adherence to the Sausalito Municipal Code, would maximize infiltration and rainwater retention, which would in turn reduce stormwater runoff for individual sites developed under the Project and Alternative 5. Although Alternative 5 could develop two additional sites beyond that anticipated under the Project, runoff impacts under Alternative 5 would be substantially similar to those under the Project, as development under both the Project and Alternative 5 would be required to implement LID features and BMPs to reduce runoff and potential pollution sources and to demonstrate that post-development runoff on individual development sites does not exceed the pre-development rate. Therefore, impacts related to flooding, exceedances in stormwater drainage systems, or the creation of substantial additional sources of polluted runoff would be considered ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less Than Significant

Impact 4.5-48 Implementation of Alternative 5 would not impede or redirect flood flows. (See Impact 3.9-6 for Project impacts related to this topic)

Both the Project and Alternative 5 would develop Opportunity Sites within FEMA-designated flood zones. As shown in **Error! Reference source not found.**, areas in the Sausalito Planning Area adjacent to Richardson Bay are located within FEMA designated 100-year flood zones with a 1 percent chance of being flooded in any given year, and 500-year flood zones with a 0.2 percent of being flooded in any given year. The development in the city that is located further away from Richardson Bay is located within Zone X – Area of Minimal Flood Hazard due to the elevation and distance from the shoreline. Additionally, 100 year flood zones are only identified in areas along the bay or within creek and river watercourses throughout the city. Under Alternative 5, neither Opportunity Site 14 nor Opportunity Site 52 are within a 100-year flood zone or 500-year flood zone. However, Site 52 is proximate to the 500-year flood zone, although the portion of Site 52 that would be developed under Alternative 5 would be higher than the flood area as it is on a slope. Alternative 5 would not develop any additional shoreline properties beyond those identified for the Project.

The General Plan includes numerous policies and programs specifically designed to address flood hazards, which would apply equally to the Project and Alternative 5. Policy HS-1.8 requires the city to minimize the potential for personal injury and damage to shoreline property from waves and flooding. Program HS-1.9.3 requires all proposed projects adjacent to the shoreline identify areas on the parcel subject to flooding and wave action. Finally, Program HS-1.7.3 requires the city to update the "100-year" flood area map as new information becomes available from the Federal Emergency Management Agency, the U.S. Department of Housing and Urban Development, County and/or local agencies. Program HS-1.8.3 requires site plans of shoreline development to identify areas of the parcel subject to flooding and wave action, and that shoreline development site plans must also be reviewed by BCDC and must follow BCDC guidelines. Sausalito Municipal Code Chapter 8.43 Floodplain Management provides updated flood hazard maps that are available to the public and ensures that individual development projects are reasonably safe from flooding, while not increasing the flood risk in another area. Furthermore, Chapter 8.48 Floodplain Management includes strategies for reducing loss from floods. These strategies include restricting uses that could pose a risk to health, safety, and property due to flood damage, requiring flood protection as part of development, controlling construction actions that could increase flood risk, and preventing alterations of stream channels and waterways which could lead to diversion of flood waters or increase flood hazards in other areas.

Localized flooding may occur in areas not delineated as flood risk areas and in areas where infrastructure becomes overwhelmed or it not properly maintained. As described in Section 3.15, Utilities and Service Systems, most of the city's storm drain infrastructure is beyond its expected useful life. However, storm drain facilities are rehabilitated as part of street improvement projects as funding permits and necessity dictates. These infrastructure improvements would likely occur concurrently with new development occurring under the Project and Alternative 5, such that the drainage system remains adequate. Policy HS-1.11 Infrastructure and related programs require the evaluation of infrastructure and capital planning to ensure that upgrades are implemented where needed to ensure resiliency as part of the City's Capital Improvement Program. Additionally, Policy S-3.8 specifically states that future construction will proceed for only those projects that demonstrate the availability of adequate potable water, sewer, septic leach fields and storm drainage.

Subsequent development, infrastructure, and planning projects pursued under the Project and Alternative 5 would be subject to the policies and programs to reduce the risks of flooding to city residents and properties as described previously. Future individual development applications under both the Project and Alternative 5 will be evaluated by City departments for consistency with development standards including consistency with the Municipal Code and General Plan at the time they are proposed. Furthermore, as described in the Regulatory Setting discussion in Section 3.9, Hydrology and Water Quality, numerous federal, State, and local agencies are responsible for maintaining flood protection features in the City of Sausalito, including the USACE, DWR, California Department of Fish and Wildlife (CDFW), BCDC, and MCSTOPPP. No floodways are delineated throughout the city. The planning area does include areas of 100 and 500 year flood hazards which are generally located along the waterfront portion of the planning area. Under both the Project and Alternative 5, no structures are proposed within a delineated floodway or along a creek or watercourse centerlines that are subject to 100 year floods. However, Opportunity Sites identified within the Project and Alternative 5 are located within the waterfront areas that do include flood hazards areas as shown on Figure 3.9-2. Alternative 5 does not identify any additional Opportunity Sites along the waterfront beyond those already identified for the Project. However, pursuant to city regulations, the city Floodplain Administrator is responsible for review of individual permit applications to ensure that proposed future development under the Project or Alternative 5 is reasonably safe from flooding including the potential for future projects to impede or redirect flows. No development is currently proposed that would impact floodwaters, and all future projects proposed under the Project and Alternative 5 would require site specific reviews. The potential to impede flood flows is comparable under Alternative 5 and the Project. Therefore, the potential impacts from impeding flood flows would be considered ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less Than Significant

Impact 4.5-49	**Implementation of Alternative 5 may be located in flood hazard or tsunami zones and may result in a release of pollutants due to project site inundation, but impacts would be less than significant. (See Impact 3.9-7 for Project impacts related to this topic)**

Inundation by Flooding
As described under Impact 4.5-48, the portions of the Sausalito Planning Area adjacent to Richardson Bay are located within FEMA designated 100-year flood zones with a 1 percent chance of being flooded in any given year and 500-year flood zones with a 0.2 percent of being flooded in any given year. Opportunity Sites that are near Richardson Bay are the same under both the Project and Alternative 5. Alternative 5 would add Site 14 and Site 52 beyond those sites proposed under the Project; neither site is located in a FEMA flood zone. As detailed under Impact 4.5-40, the General Plan contains policies and programs specifically designed to address flood hazards. In addition, the Sausalito Municipal Code contains rules and regulations to reduce the risks of flooding, and those policies and programs would apply equally to the Project and Alternative 5. Chapter 8.48 (Floodplain Management) describes methods for reducing losses due to floods such as restricting uses, requiring flood damage protection at the time of initial construction; controlling actions, such as filling, grading, and dredging, that may increase flood damage, or actions, such as alteration of stream channels and construction of barriers, that can divert flood water and therefore increase flood hazards in other areas. Additionally, Chapter 8.48 provides updated flood hazard maps for Sausalito and Marin County.[39] No development is currently proposed that would impact floodwaters, and all future projects proposed under the Project and Alternative 5 would require site specific reviews. The potential to impede flood flows is the same under Alternative 5 as it is for the Project. Pursuant to city regulations, the city Floodplain Administrator is responsible for site-specific reviews of permit applications to ensure the development is reasonably safe from flooding and that it would not increase the flood risk in the area. Chapter 11.17 (Urban Runoff Pollution Prevention Ordinance) requires construction sites to implement BMP on-site controls such as scheduling and timing of grading activities, revegetation of graded areas, using hydro-seed and mulches to stabilize slopes, and control blankets. Furthermore, newly developed or redeveloped lands are required to maintain pre-development

[39] City of Sausalito Department of Public Works, Engineering Division. Sea Level Rise and FEMA Flood Insurance. Website: https://www.sausalito.gov/departments/public-works/engineering-division/sea-level-rise-and-fema-flood-insurance. Accessed March 25, 2020.

stormwater runoff rates and prevent stormwater pollution where possible through LID design.

The Sausalito Municipal Code Chapter 8.48 (Floodplain Management) includes standards of construction, elevation and flood proofing coastal and flood areas including the following requirements:

- New construction and substantial improvement of any structure shall have the lowest floor, including basement, elevated to or above the base flood elevation.
- Within coastal high hazard areas all new construction and substantial improvements shall be elevated on adequately anchored pilings or columns and securely anchored to such pilings or columns so that the lowest horizontal portion of the structural members of the lowest floor (excluding the pilings or columns) is elevated to or above the base flood elevation.

The Project and Alternative 5 include housing programs that accommodate increased densities and additional residential development types within areas of the city that include existing and future development areas. Land uses types that generally store and use hazardous materials include industrial and manufacturing uses while residential type uses generally do not store or include hazardous material for everyday operation/living. Mandatory federal and State regulations govern the storage and use of hazardous materials to ensure appropriate containment to prevent spills, while the Sausalito Municipal Code identifies specific standards for development within flood and coastal hazard areas. These regulations apply to existing development that handles hazardous materials, including industrial and commercial uses in the vicinity of residential development, as well as to new uses that would handle hazardous materials. These regulations would apply equally to the Project and Alternative 5, neither of which propose industrial or manufacturing uses. Therefore, hazardous materials impacts from inundation by flooding would be similar under the Project and Alternative 5, and would be ***less than significant*** for the Project and Alternative 5.

In addition, the General Plan includes policies and programs that will further ensure impacts remain less than significant. These policies and programs apply equally to the Project and Alternative 5. Policies HS-1.7 Flooding and HS-1.8 shoreline safety, and related programs, requires study, mapping and identification of adaptation and mitigation strategies. Program HS-1.8.3 requires site plans of shoreline development to identify areas of the parcel subject to flooding and wave action, and that shoreline development site plans must also be reviewed by BCDC and must follow BCDC guidelines, while Policy HS-1.11 Infrastructure and related programs require the evaluation of infrastructure and capital planning to ensure that upgrades are implemented where needed to ensure resiliency as part of the City's Capital Improvement Program. Policy HS 1.3 requires new development or substantial remodeling in relevant areas to incorporate climate resilience strategies into designs and follow BCDC

guidance suggesting reduction of new development or substantial remodels in coastal zones.

Earthquakes centered close to a dam or levee are typically the most likely cause of dam or levee failure. As discussed in the Environmental Setting in Section 3.9, Hydrology and Water Quality, there are no significant levees or dams protecting the City of Sausalito. Alpine Dam reservoir is located 10 miles to the north of the Planning Area and is the most likely reservoir to be affected by seismic activity. Current estimates indicate that if dam failure occurs during an earthquake, up to 8,892 acre-feet of water could be released into Tomales Bay, which is located over 22 miles northwest of the Planning Area. In the event of a dam failure, the City of Sausalito would be affected to the same level under the Project and Alternative 5. Therefore, development facilitated by implementation of the Project or Alternative 5 would not result in substantial inundation by dam or levee failure, and ***no impact*** would occur for either the Project or Alternative 5 related to a release of pollutants due to inundation by dam or levee.

Inundation by Tsunami or Seiche

Seiches are changes or oscillations of water levels within a confined water body. The Planning Area is located in proximity to the San Francisco Bay and Richardson Bay (semi-confined water bodies), which could pose a risk from a seiche events similar to that of a tsunami threat. A tsunami is a sea wave caused by a submarine earthquake, landslide, or volcanic eruption. Tsunamis can cause catastrophic damage to shallow or exposed shorelines. The coastal low-lying portions of Sausalito, portions of the low-lying plain along Richardson Bay, and most of the area east of Bridgeway are subject to the risk of tsunami inundation (see **Error! Reference source not found.**). As such, some development facilitated by implementing the Project or Alternative 5 could be located within a tsunami inundation area. Under Alternative 5, Site 14 would not be within a tsunami inundation area as it is located up along the ridgeline and not adjacent to Richardson Bay or the San Francisco Bay. Alternative 5 would also add Opportunity Site 52. The eastern half of the block bound by Bonita St., Bee St., Caledonia St., and Litho St. is within a tsunami hazard zone. Therefore, development on Site 52 could expose residents to hazards caused by tsunami.

A portion of Site 84, which would be included as an Opportunity Site under both the Project and Alternative 5, is within a tsunami hazard zone. Under Alternative 5, fewer units would be constructed on Site 84 than under the Project. The Project proposes 94 units, while Alternative 5 proposes a decrease in units to 80 units or 50 units. As compared to the Project, Alternative 5 would expose slightly fewer people to hazards from a tsunami.

In accordance with State and federal regulations, Program HS-1.4.7: Hazardous Materials Business Plan requires that all businesses that store more than 55 gallons of hazardous materials on-site file a Hazardous Materials Business Plan with the County Office of Waste Management. Implementation and maintenance in accordance with federal, state, and local

regulations governing the storage of hazardous materials reduces significance of potential pollutant release.

Moreover, in the unlikely event of a tsunami, Sausalito would implement the City's emergency response plan (per General Plan Program HS-2.2.2), which would also address any release of pollutants due to inundation. Additionally, Program HS-2.2.1 would maximize participation in emergency preparedness efforts by ensuring that Sausalito maintains consistent, widespread, and centralized distribution of information throughout the city.

Additionally, the City's General Plan contains policies and programs to reduce the likelihood of development impacts within a tsunami inundation area. These policies and programs would apply equally to the Project and Alternative 5. Pursuant to Program HS-2.2.10, Release of Pollutants Due to Project Site Inundation, the city will develop an action plan to identify how the city will address the potential release of pollutants within the city's flood hazard and tsunami zones, should they become inundated. Program HS-1.8.1 requires the city to conduct sea level rise assessment (Policy S-3.1) and proactively pursue adaptation and mitigation strategies in coordination with the County (Policy S-3.2), including review of sea level rise, flooding, and tsunamis on parcels that have an elevation of 25 feet or less above Mean Lower Low Water level datum through the environmental review process. Program HS-1.8.3, requires submittal of shoreline development site plans to identify areas of the parcel subject to flooding and wave action. In addition, the policies and programs related to sea level rise would also assist in minimizing inundation in the event of a tsunami.

Impacts of the Project and Alternative 5 would have similar levels of development on Opportunity Sites in flood hazard or tsunami zones, and would not result in a release of pollutants due to project site inundation. Therefore, potential impacts would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less Than Significant

Impact 4.5-50	**Implementation of Alternative 5 would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. (See Impact 3.9-8 for Project impacts related to this topic)**

The City of Sausalito is within a regional watershed administered by the RWQCB. The RWQCB has established regulatory standards and objectives for water quality in San Francisco Bay

in its Water Quality Control Plan for the San Francisco Bay Basin, commonly referred to as the Basin Plan.

As discussed under Impact 4.5-43, construction and operation of development facilitated by both the Project and Alternative 5 would be required to comply with Clean Water Act, the General Plan policies and programs, the Sausalito Municipal Code, and the mandatory NPDES permit requirements. Therefore, future development facilitated by the Project or by Alternative 5 would need to, at the time of site-specific construction and operation, not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, in compliance with the San Francisco Bay Basin Plan. As such, implementation of the Project or Alternative 5 would result in a ***less than significant*** impact relative to this topic.

As discussed under Impact 4.5-44, there is no groundwater basin in the Sausalito Planning Area. As such, there is no existing groundwater management plan for the Planning Area, and implementation of the Project or Alternative 5 would not affect groundwater. Therefore, implementation of the Project and Alternative 5 would not conflict with or obstruct implementation of a sustainable groundwater management plan. There would be ***no impact*** on sustainable groundwater management plans for either the Project or Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less Than Significant

Impact 4.5-51	**Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to hydrology and water quality. (See Impact 3.9-9 for cumulative plus Project impacts related to this topic)**

This analysis evaluates whether the impacts associated with implementing Alternative 5, together with the impacts of cumulative development would result in a cumulatively significant impact on hydrology or water quality. This analysis then considers whether incremental contribution of the impacts associated with the implementation of Alternative 5 would be significant. Both conditions must apply for cumulative impacts to rise to the level of significance.

Cumulative development contributes to an incremental increase in impervious surfaces that could introduce pollutants that are typically associated with urban runoff into the

stormwater and/or contribute to cumulative flood conditions in the watersheds. Cumulative development could also contribute to water quality impacts in the watersheds from construction activities. Cumulative impacts would be less than significant because cumulative development, infrastructure, and planning projects would be subject to numerous federal, State, and local requirements responsible for maintaining flood protection features in the City of Sausalito, including the USACE, DWR, CDFW, BCDC, and MCSTOPPP. Accordingly, all cumulative projects would be subject to local, State and federal permit requirements and would be required to comply with city ordinances and General Plan policies, as well as other water quality regulations that control construction-related and operational discharge of pollutants in stormwater. The water quality regulations implemented by the RWQCB take a basin-wide approach and consider water quality impairment in a regional context. For example, the Construction General Permit ties receiving water limitations and basin plan objectives to terms and conditions of the permit, and the MS4 Permit works with all municipalities to manage stormwater systems to be collectively protective of water quality. For these reasons, cumulative impacts to hydrology and water quality would be ***less than significant*** for Alternative 5 and the Project.

Moreover, the incremental contribution to less than significant cumulative impacts would not be significant. As discussed above, development resulting from the Amended Housing Element is largely within similar development footprints and use types as what was already evaluated and disclosed as part of the 2021 General Plan EIR, and all future development within sites will be subject to both proven continuing policies and enhanced policies to reduce hydrology impacts. Future development applications would be evaluated by City departments for consistency with development standards including consistency with the Municipal Code and General Plan at the time they are proposed. Additionally, as previously discussed, development facilitated by the program would be required to conform to federal, State, and local policies that would reduce hydrology and water quality impacts to less-than-significant levels. More specifically, potential changes related to stormwater quality, stormwater flows, drainage, impervious surfaces, and flooding would be minimized by the implementation of stormwater control measures, retention basins, infiltration, and LID measures, and review by the City's Public Works Department to integrate measures to reduce potential flooding impacts. Therefore, the limited scope and scale of the construction and other activities envisioned by Alternative 5 will not contribute to a cumulative hydrology impact.

For these reasons, Alternative 5's contribution to cumulative hydrology and water quality impacts would be ***less than significant***, similar to the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Land Use and Planning

Information regarding the existing setting, regulatory setting, and thresholds of significance for Land Use and Planning impacts can be found on pages 3.10-1 through 3.10-6 in Section 3.10, Land Use and Planning, of the Draft EIR.

Impact 4.5-52 Implementation of Alternative 5 would not physically divide an established community. (See Impact 3.10-1 for Project impacts related to this topic)

Neither the Project nor Alternative 5 would lead to new development or features that would physically divide established communities. The physical division of an established community typically refers to the construction of a physical feature (such as a wall, interstate highway, or railroad tracks) or the removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas. Neither the Project nor Alternative 5 contemplate or authorize any such physical changes to the community.

The Sausalito Planning Area has a predominantly residential character, and includes larger residential parcels, long established neighborhoods, scenic hillsides, open space areas, and established commercial and office areas. The Project and Alternative 5 do not propose or approve specific development projects. The potential development of Opportunity Sites and Inventory Sites throughout the city on vacant or underutilized parcels would preserve the existing pattern of uses and urbanization and would implement City standards for protection and long-term maintenance of established neighborhoods and uses.

New development consistent with the Project and Alternative 5 would represent an incremental increase in new residential uses throughout the city and along the waterfront areas. Such development would be limited to vacant and/or underutilized existing parcels as shown in Figure 2-5 for the Project, and Figure 4.5-6 for Alternative 5. Most development under the Project and Alternative 5 is expected to be on developed lots in areas where existing infrastructure (including highways and local roadways) are already in place.

Both the Project and Alternative 5 would retain the existing roadway patterns and do not propose any new major roadways or other physical features, such as walls or bridges, that would create new barriers to connectivity in the Planning Area. Further, development under the Project and Alternative 5 would be located on sites either developed, underutilized, or near existing residential, commercial, and industrial uses. Accordingly, the potential growth in residential uses under the Project or Alternative 5 would be infill development and would occur within the fabric of already developed areas throughout the city.

The City's General Plan includes policies and programs that promote cohesive and compatible neighborhoods and prevent new development from dividing existing uses where different land uses abut one another, which would be equally applicable to the Project and Alternative 5. Policies LU-1.1 through LU-1.7 establish the allowable uses under each residential land use category. Policies LU-1.13 through LU-1.15 address the placement of

non-residential facilities within and adjacent to residential areas to ensure compatibility between the two uses. Policy LU-2.1 requires the city to retain the boundaries of the visitor-serving commercial area in the Downtown to provide a clear distinction between the visitor-serving commercial activities and neighboring residential uses. Policy LU-2.3 provides a buffer between tourist and residential uses by ensuring that the Downtown visitor commercial area and the Caledonia Street residential serving commercial areas remain distinct. Under Alternative 5, Site 52 would be within the residential area of the Caledonia Street corridor. Policy LU-2.5 encourages rebuilding and reuse of commercial space in a manner which minimizes conflict with adjacent residential uses. Policy LU-2.16 requires the city to ensure that office uses do not adversely affect the desired continuance of marine related industrial and waterfront uses in the Marinship area. Policy LU-4.1 promotes marine industrial oriented uses that require waterfront locations and ensure the preservation of the existing general industrial uses found in the Marinship waterfront area.

Moreover, the Project and Alternative 5 would maintain the City's urban uses and limit the introduction of new uses or features that could divide an established community. For example, Policy LU-4.2 prohibits the creation of new shoreline recreational marinas along the Marinship waterfront. Under the Project and Alternative 5, primarily residential uses would be developed throughout the city, as well as some neighborhood-serving retail uses. New recreational marinas are not proposed as part of the Project or Alternative 5. Future development in accordance with the Project and Alternative 5 would be subject to these General Plan policies. The types of development under the Project and Alternative 5 would be the same, and neither would divide an established community.

Therefore, both the Project and Alternative 5 would have ***no impact*** associated with the physical division of an established community.

Level of Significance before Mitigation
No Impact

Mitigation Measures
None Required

Level of Significance after Mitigation
No Impact

Impact 4.5-53 Implementation of Alternative 5 would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (See Impact 3.10-2 for Project impacts related to this topic)

A discussion of the Project's consistency with State regulations, plans, and policies associated with specific environmental issues (e.g., air quality, GHG emissions, transportation, water

quality, etc.) is provided in the relevant sections in Chapter 3 of this Draft EIR. Alternative 5's compliance and consistency with established regulations, plans, and policies is discussed in this chapter, Chapter 4, Alternatives to the Proposed Project.

As discussed throughout this Draft EIR, the Project was found to be consistent with State plans, policies, and regulations. The State would continue to have authority over any State-owned lands in the vicinity of the Sausalito Planning Area and the Project would not conflict with continued application of State land use plans, policies, and regulations adopted to avoid or mitigate environmental effects. Alternative 5 would develop the same uses as the Project, with a slightly different unit count and Opportunity Site inventory. Nevertheless, Alternative 5 would also be consistent with State plans, policies, and regulations, and would not conflict with the State's management of State lands or implementation of State regulations.

Applicable regional and local plans and regulations include Plan Bay Area 2040, Bay Area Air Quality Management District (BAAQMD) 2017 Clean Air Plan, Marin BayWAVE Plan, Sausalito Climate Action Plan, San Francisco Bay Plan, San Francisco Bay Regional Water Quality Control Board's (RWQCB) Water Quality Control Plan (Basin Plan), Marin County Stormwater Pollution Prevention Program (MCSTOPPP) Stormwater Program, Marin County Integrated Waste Management Plan, Marin County Transportation Authority plans, and the Marin County General Plan. A discussion of the Project's and Alternative 5's consistency with regional and local regulations, plans, and policies associated with specific environmental issues (e.g., air quality, GHG emissions, transportation, water quality, etc.) is provided in the relevant sections of this Draft EIR and in this section, Chapter 4, Alternatives to the Proposed Project. As discussed throughout this Draft EIR, both the Project and Alternative 5 would be consistent with regional and local plans, policies, and regulations.

As set forth by state law, the General Plan serves as the primary planning document for the City and all subordinate documents and plans are required to be consistent with the General Plan. The Project's inventory of sites is a State-mandated requirement to ensure that the City's RHNA can be accommodated. In other words, the Housing Sites Inventory demonstrates that there is enough land zoned at appropriate densities to accommodate the RHNA allocation. However, this Inventory does not include all potential development sites within Sausalito, and does not mean that sites in the Inventory will be developed at the allowable densities. In addition, information about the design and placement of buildings on the sites will not be available unless/until a specific development is proposed.

Under Alternative 5, Site 84 would reduce its anticipated unit count from 94 under the Project to 80 units. This alternative would also include the option to include a ballot measure for Site 84 with a reduced number of units (50 units), or the unit count could be reduced to zero units on the site. If there is a RHNA shortfall in the City, two additional Opportunity Sites could be developed to help the City reach its RHNA goal. Site 14 and Site 52 could accommodate 20-25 units each. Alternative 5 would be similar to the Project in that it would be consistent with

the General Plan and the inventory of sites available for residential development would ensure that the City's RHNA could be accommodated.

Implementation of the proposed Project and Alternative 5 does not, in and of themselves, directly cause new housing to be constructed in the City. However, rezoning under both the Project and Alternative 5 would result in land use changes that could have an effect on the environment.

Sausalito's total RHNA for the 2023–2031 planning period is 724 units, allocated to specific income groups. Parcels to accommodate the City's RHNA fall into four categories:

1. Sites with zoning in place (vacant and underutilized);
2. Opportunity sites to be rezoned (vacant and underutilized);
3. Residential projects with development entitlements with occupancy post June 30, 2022; and
4. Projected accessory dwelling units and SB 9 units on underutilized sites.

All of the proposed housing sites under the Project and Alternative 5 are designated for urban or residential uses in the adopted General Plan; none of the existing and candidate sites are designated for conservation or preservation uses.

Both the Project's inventory of sites and Alternative 5's inventory of sites would meet the State-mandated requirement to ensure that the City's RHNA can be accommodated. In other words, the identified Opportunity Sites and Inventory Sites for both the Project and Alternative 5 demonstrate that there is enough land zoned at appropriate densities to accommodate the RHNA allocation under either scenario.

A main objective of the Housing Element is to meet the City's housing needs, including accommodating a variety of housing types and densities. Implementation of the the Project and Alternative 5 and development of new housing in Sausalito would, for the most part, be in or adjacent to urbanized areas and would occur on properties that are currently designated in the General Plan for urbanization. The Project and Alternative 5 would identify locations city-wide (including those on the water) and funding sources to produce housing for Very Low, Low, and Moderate Income households in each Housing Element cycle (General Plan Program LU-1.19.1). Under Alternative 5, affordability assumptions would be adjusted for Site 303, increasing the number of very low and low income units. Under this alternative, if there is a shortfall in sites available to accommodate the RHNA, the minimum number of units at Site 202 (Alta Mira) would be increased, although there would be no increase in the maximum number of units that would be accommodated on that site.

The housing sites identified by the Project and Alternative 5 have been identified as potential sites that could be used to address the need for housing within the City in areas designated for urban land uses under the General Plan. The housing sites are generally located in areas that would provide access to services, shopping, and public transportation, while

accommodating the City's RHNA. Thus, the Opportunity Sites identified for the Project and Alternativ 5 are consistent with the General Plan.

Both the Project and Alternative 5 would directly conflict with Policy CD-1.3 of the City's General Plan, which establishes maximum height limits for structures, as a result of the allowed increases in building heights to four stories in select overlay zones. However, the Project and Alternative 5 would be consistent with the remaining General Plan policies and programs. The aesthetic-related impacts associated with these increased building heights are discussed in Section 3.1, Aesthetics, and in Impacts 4.5-1 through 4.5-5.Subsequent development that is consistent with the Project and Alternative 5, including the development of the existing and candidate housing sites, would be required to be consistent with the General Plan, including policies and programs adopted to address environmental impacts. These individual subsequent projects under the Project or Alternative 5 would be reviewed for consistency with the City's development standards set forth in the Municipal Code and Design Guidelines as part of the design review process. Neither the Project nor Alternative 5 would remove or modify any policies or measures from the General Plan that are intended for environmental protection and would not conflict with any General Plan policies or measures that are intended for environmental protection. The level of impact under Alternative 5 would be the same as under the Project. For these reasons, this impact would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-54	**Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to land use. (See Impact 3.10-3 for cumulative plus Project impacts related to this topic)**

This analysis evaluates whether the impacts of Alternative 5, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to land use. This analysis then considers whether incremental contribution of impacts associated with the implementation of the Alternative 5 would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of significance. The geographic context for the analysis of cumulative impacts related to land use includes the incorporated and unincorporated lands surrounding the Planning Area.

Cumulative development is likely to continue occurring in the surrounding cities of Mill Valley, Tiburon, Larkspur, and San Rafael. However, most of this development would take place in urbanized areas as in-fill development and not require significant land use changes that would create land use conflicts, nor would they divide existing communities. Further, the unincorporated lands surrounding the Planning Area are mostly protected as parks and open space areas (see Section 3.13, Public Services and Recreation) and are not anticipated to be developed. The remaining unincorporated lands adjacent to the Planning Area are subject to the land use plans, policies, and regulations of Marin County. As such, development within unincorporated Marin County is not likely to create significant land use conflicts or divide existing communities. For these reasons cumulative impacts with respect to land use would be ***less than significant*** for the Project and Alternative 5.

The proposed project's incremental contribution to cumulative land use impacts would also not be significant. The land uses allowed under Alternative 5 provide opportunities for cohesive new growth in vacant and underutilized existing parcels within developed areas, as well as limited new development along the waterfront areas within the Planning Area. As discussed under Impacts 4.5-52 and 4.5-53, implementation of Alternative 5 would not physically divide an established community or conflict with any land use plan, policy, or regulation within or outside the City of Sausalito, adopted for the purpose of avoiding or mitigating an environmental effect. As such, development anticipated under Alternative 5 would not create substantial land use impacts or result in the physical division of existing communities. New development and redevelopment consistent with the Alternative 5 would be designed to complement the character of existing neighborhoods and provide connectivity between existing development and new development within the cumulative analysis area. Further, Alternative 5 does not approve the construction or development of any new roadways, walls, bridges, major infrastructure, or other features that would divide existing neighborhoods within the cumulative analysis areas. Accordingly, the Alternative 5's contribution to cumulative impacts would also be ***less than significant*** for the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Noise

Information regarding the existing setting, regulatory setting, and thresholds of significance for Noise impacts can be found on pages 3.11-1 through 3.11-18 in Section 3.11, Noise, of the Draft EIR.

Impact 4.5-55	**Implementation of Alternative 5 would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established by the local general plan, noise ordinance, or applicable standards of other agencies. (See Impact 3.11-1 for Project impacts related to this topic)**

Both the Project and Alternative 5 would rezone vacant and underutilized properties throughout the city to accommodate the City's RHNA allocation of 724 units, plus a buffer to ensure that there is no net loss of units. Under the Project, up to 1,147 units could be constructed. Under Alternative 5, up to 1,133 units could be constructed. The Opportunity Sites identified for the Project would also be identified for Alternative 5. Additionally, Alternative 5 would add two new Opportunity Sites, Site 14 and Site 52 that would only be used in the event of a shortfall to accommodate the RHNA; the number of units on Site 84 would decrease from 94 units to 80 units, or possibly down to 50 units or zero units; and the minimum density permitted on Site 202 would increase, but there would be no change to the realistic maximum number of units compared to the Project.

The General Plan includes policies that require preparation of acoustical studies for residential development where the existing noise levels exceed an exterior noise level of 60 dBA CNEL. Additionally, policies require that new office and commercial development be designed to reduce interior noise levels. Individual development projects proposed under the Project and Alternative 5 would be required to demonstrate compliance with these standards during the design review process. Temporary noise is typically related to construction noise, evaluated below, as well as single event noise, which can generate elevated sound levels associated with special events. Neither the Project nor Alternative 5 propose any additional special events or sources of single-event noise. Single event noise is controlled through the issuance of a city permit as directed by Policy HS-3.4, which allows single-event occurrences at specific sites subject to special permit conditions which alleviate noise to the greatest extent possible. Program ES-3.2.1 requires that special events obtain a City permit to consider and address the potential impacts of parking, noise, congestion, and lighting. Should special events be proposed on Opportunity Sites at a later time, the appropriate City permit must be granted on a site-specific, event-specific basis.

Moreover, Section 12.16.140 of the Municipal Code is applied to all construction permits and compliance is mandatory and is monitored by City grading and building department personnel, and is also monitored and addressed through reporting by members of the public if and when construction hours are not being observed. Accordingly, because individual projects consistent with the Project and Alternative 5 would be required to demonstrate

compliance with these policies, programs, and permits, as applicable, potential impacts related to single event noise would be ***less than significant*** for both the Project and Alternative 5.

Construction Noise

Noise generated by individual construction projects are anticipated to occur under both the Project and Alternative 5, and would temporarily increase ambient noise levels on adjacent sites from construction activities and from construction-related traffic. Since there are no specific development proposals associated with the Project or Alternative 5, determining exact noise levels, locations, or time periods for construction of such projects is speculative. However, sites adjacent to areas where future development/redevelopment is anticipated to occur could expose people to construction noise throughout the construction period. Alternative 5 would reduce the number of units on Site 84, which could lead to slightly less construction duration and, therefore, less ambient noise and noise from construction-related traffic in the vicinity of Site 84.

Site 14 would be an additional site under Alternative 5. It is surrounded by residential uses, the Spencer East Park & Ride, and Highway 101. Construction on Site 14 would result in ambient and construction-related traffic noise that would be beyond that of the Project. However, construction on the site would be short-lived and may be less noticeable to the human ear due to the proximity of the site to Highway 101.

Site 52 would be an additional site under Alternative 5. It is surrounded by residential uses, government uses (City Hall), and Robin Sweeney Park. Construction-related noise would be present during onsite construction activities, and construction-related traffic noise would occur. This increase in temporary ambient and construction-related noise would be beyond that of the Project.

Construction activities, including traffic, demolition, and reconstruction, have the potential to generate temporary noise. Noise levels similar to those shown in Table 3.11-9 would be expected to occur with individual development projects implemented under the Project and Alternative 5. Table 3.11-10 in Section 3.10, Noise, illustrates typical noise levels associated with construction equipment at a distance of 50 feet from a construction site. Noise typically drops off at a rate of 6 dBA per doubling of distance. Noise levels at 100 feet and 200 feet were derived based on this assumption.

The City has not adopted numeric thresholds of significance for construction noise. Rather, the City has determined that construction noise is normally less than significant because it is subject to mandatory regulatory requirements, and because it is temporary in nature, intermittent, and a normal part of living in a developed, urban area. This assertion would be carried forward and applied to future projects constructed on Opportunity Sites under both the Project and Alternative 5.

Mandatory requirements in the Sausalito Municipal Code and General Plan will ensure that construction noise associated with General Plan implementation remains less than significant, which would apply equally to the Project and Alternative 5. Municipal Code Section 12.16.140 regulates the time when construction activities may occur, limiting such activities to the period between 8:00 a.m. and 6:00 p.m. on weekdays, 9:00 a.m. and 5:00 p.m. on Saturdays, and prohibiting construction from occurring on Sundays and holidays. Section 12.16.140 of the Municipal Code is applied to all construction permits and compliance is mandatory and is monitored by city grading and building department personnel, and is also monitored and addressed through reporting by members of the public if and when construction hours are not being observed. This ensures that construction noise will not occur during the evenings, overnight hours, Sundays, and holidays, when residents are most vulnerable to noise disturbance (i.e., when they are spending time at home, sleeping, attending religious services or holiday activities).

Programs and policies in the General Plan further ensure that construction noise occurring during implementation of the Project and Alternative 5 will be reduced to acceptable levels, consistent with the Noise Ordinance. General Plan Program HS-3.5.2 requires the City to continue to restrict construction activities to acceptable time periods, as discussed above. Program HS-3.5.4. requires construction projects to clearly delineate working hours, which further ensures that the temporal restrictions on construction noise are observed. Program HS-3.5.1 requires noise baffling devices to be installed on heavy equipment during site excavation, grading, or construction. Installation of baffling devices on the loudest pieces construction equipment will ensure that maximum construction noise levels are reduced to acceptable levels. Furthermore, under Program HS-3.5.3, the city may require construction of temporary sound walls around individual construction sites on a case-by-case basis, to ensure that construction noise levels remain appropriate.

Therefore, while implementation of the Project and Alternative 5 could result in construction noise that would disturb residents and workers, that construction noise will be temporary, intermittent, and a normal part of living an urban environment. Moreover, compliance with mandatory requirements of the Municipal Code and General Plan will ensure that construction noise occurs only at appropriate times of day and is reduced to acceptable levels. Construction noise may be slightly worse under Alternative 5 as compared to the Project because it includes two additional Opportunity Sites, but construction noise would be ***less than significant*** under both the Project and Alternative 5.

Traffic Noise

Buildout of the Project and Alternative 5 would generate additional vehicle trips on the city roadways. Noise from motor vehicles is generated by engine vibrations, the interaction between tires and the road, and the exhaust system. The traffic noise contours with buildout of the Project were calculated through use of the FHWA-RD-77-108 model and the traffic volumes provided by the traffic engineer (Kittleson & Associates) and disclosed in Table 3.11-

11 in Section 3.11, Noise. Table 3.11-11 shows each roadway segment's noise level at 50 feet from the centerline as well as the distance to the 60 dBA CNEL noise contour.

Program HS-3.1.2 directs the city to update the Zoning Ordinance to integrate the Land Use Compatibility Standards (see Table 3.11-8 in Section 3.11, Noise) that details 60 dBA CNEL is the normally acceptable exterior noise exposure level for nearby sensitive receptors. However, neither the General Plan nor the CEQA Guidelines define what constitutes a "substantial permanent increase;" as such, this analysis has utilized guidance from the FTA for a moderate impact and is summarized below:

- When ambient noise levels are between 45 and 49 dBA CNEL, an increase of more than 7 dB at the exterior of any nearby sensitive receptor is considered significant.
- When ambient noise levels are between 50 and 54 dBA CNEL, an increase of more than 5 dB at the exterior of any nearby sensitive receptor is considered significant.
- When ambient noise levels are between 55 and 59 dBA CNEL, an increase of more than 3 dB at the exterior of any nearby sensitive receptor is considered significant.
- When ambient noise levels are between 60 and 64 dBA CNEL, an increase of more than 2 dB at the exterior of any nearby sensitive receptor is considered significant.
- When ambient noise levels are between 65 and 74 dBA CNEL, an increase of more than 1 dB at the exterior of any nearby sensitive receptor is considered significant.
- When ambient noise levels are 75 dBA CNEL or greater, any measurable increase in noise levels at the exterior of any nearby sensitive receptor is considered significant.

The Project traffic noise impacts were analyzed for the Without Project and the With Project conditions.

Table 3.11-12 in Section 3.11, Noise, shows that at Project Buildout, noise generated by traffic along study area roadway segments would be expected to increase by 0 to 1 dBA CNEL above the Without Project Buildout conditions. Table 3.11-12 also shows that the Project's permanent roadway noise increases to the nearby sensitive receptors from the generation of additional vehicular traffic would not exceed any of the thresholds detailed above.

Under Alternative 5, there would be slightly fewer total units and units at Sites 14 and 52 are projected to produce somewhat lower VMT per capita than units at Site 84, which would result in less traffic-related noise. This means that shifting any number of units from Site 84 to Site 14 and/or Site 52 would reduce overall traffic-generated noise levels as compared to the Project. Therefore, transportation-related noise under Alternative 5 would be slightly lower than under the Project. Traffic-related noise generated by implementation of the Project or Alternative 5 would not exceed any noise thresholds. Therefore, impacts associated with the Project and Alternative 5 would be ***less than significant***.

Non-Transportation Noise

The Project would potentially result in up to 1,147 new housing units, while Alternative 5 would potentially result in up to 1,133 new housing units. Typical noise sources associated with residential housing include garbage collection, parking lots, and HVAC equipment. These types of noise sources are typical of all residential uses and are typically considered compatible with existing residential uses, and other noise-sensitive receptors, without needing special noise control measures. Additionally, these sources of noise are regulated by the Sausalito Municipal Code standards. Therefore, non-transportation noise impacts would be substantially the same between the Project and Alternative 5. Impacts from non-transportation noise sources would be ***less than significant*** for both the Project and Alternative 5.

Therefore, implementation of the Project or Alternative 5 would not result in a temporary or permanent increase in ambient noise levels above established standards, and the impact would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation

Less than Significant

Mitigation Measures

None Required

Level of Significance after Mitigation

Less than Significant

Impact 4.5-56 Implementation of Alternative 5 would not generate excessive groundborne vibration or groundborne noise levels. (See Impact 3.11-2 for Project impacts related to this topic)

Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of groundborne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Construction activities and the operation of heavy trucks, buses and trains can produce vibration that may be felt by adjacent uses.

New development under the Project could result in up to 1,147 new residential units and 5,171 non-residential square footage within the Sausalito Planning Area. New development under Alternative 5 could result in up to 1,133 new residential units and 5,171 non-residential square feet. The city contains several historic structures that have been identified in Figure 4-1 of the General Plan and Figure 3.4-1 of this EIR. Those structures have the potential of being damaged from exposure to substantial vibration levels.

Under Alternative 5, Opportunity Site 52 would be anticipated to develop residential uses. There are no City of Sausalito Historic Landmarks, Potentially Eligible Historic Properties, or Properties Listed on National Register adjacent to Site 52. However, Site 52 is part of a larger parcel, the existing City of Sausalito City Hall and Library. Historically known as the Old Central School/Sausalito City Hall, the structure has a CRHR Status Code of 7N, "Needs to be reevaluated (Formerly NR Status Code 4)."[40] The City Hall and Library building is identified in the City's historic resources inventory.[41] Under Alternative 5, development is anticipated to occur only on the northern portion of the site, where the existing surface parking is located. Development of Alternative 5 is not expected to result in the demolition, refurbishment, or alteration of the existing City Hall and Library building. However, development in close proximity to the building could result in vibration that could affect the integrity of the building.

Under Alternative 5, Opportunity Site 14 would be anticipated to develop residential uses. Alternative 5 would remove the existing fire station structure at 300 Spencer Avenue (Sausalito Fire Station No. 2), which is more than 50 years old and is a potentially eligible historic property. The fire station has not been evaluated for the NRHP or CRHR (California Register Status Code 7). Because the structure would be torn down under Alternative 5, it would not be exposed to potentially damaging construction vibration.

Opportunity Site 202 would have an increased minimum density as compared to the Project. However, vibration emanating from Site 202 would be no different under Alternative 5 than under the Project because the same amount of ground would be disturbed, and within the same proximity to potentially eligible historic properties, a property listed on the National Register, and the Downtown Historic District. Similarly, potential vibration impacts to the Alta Mira Hotel (Alta Mira Recovery Programs building) would be identical under Alternative 5 as under the Project.

The short-term and long-term groundborne vibration impacts associated with construction and operations are discussed separately below.

Construction-Related Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment used on the site. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings in the vicinity of the construction site respond to these vibrations with varying results ranging from no perceptible effects at the low levels to slight damage at the highest levels. **Table 3.11-13**

[40] City of Sausalito, 2022. Sausalito Citywide Historic Context Statement. VerPlanck Historic Preservation Consulting. October. p. 12. Table 2.

[41] City of Sausalito, 2022. Sausalito Citywide Historic Context Statement. VerPlanck Historic Preservation Consulting. October. p. 12. Table 2.

in Section 3.11, Noise, shows approximate vibration levels from various construction equipment.

Since the City does not have a quantitative vibration standard in the General Plan or Sausalito Municipal Code, this analysis has utilized guidance provided by Caltrans, which identifies a standard for historical structures of 0.12 inch per second PPV for transient sources (see Table 3.11-6 in Section 3.11, Noise). As shown in Table 3.11-13, potential vibration levels from representative construction equipment that occur in close proximity to an existing historic structure, could potentially damage the structure.

Since development facilitated by both the Project and Alternative 5 may result in construction activities that occur immediately adjacent to existing historical structures, there is a possibility that vibration from construction equipment would exceed the 0.12 inch per second PPV threshold. Therefore, groundborne vibration impacts from construction activities associated with future development under either the Project or Alternative 5 would be ***potentially significant.***

The General Plan includes Policy HS-3.6 and Program HS-3.6.1, which require that any property owner or developer of any new construction project located within 150 feet of a historical structure identified in Figure 4-1 of the General Plan, to submit a vibration analysis for potential impacts from vibration generated by construction equipment prior to issuance of grading permits. The individual projects that have the potential to impact historical structures during construction activities include those that will either: (1) conduct pile driving within 150 feet; or (2) utilize mobile construction equipment within 50 feet of any existing structure with sensitive receptors. Using alternate construction equipment, such as sonic pile drivers or drilled piles, can perform pile driving functions at much lower vibration levels than traditional pile drivers. Using similar pieces of earthmoving equipment, such as using a small dozer in place of large dozer, can be used to reduce vibration levels in vibration sensitive areas. However, because development under the Project or Alternative 5 could occur within 150 feet of a historical resource, construction-related vibration impacts would be ***potentially significant***.

Operation-Related Vibration

The primary source of vibration created from on-going operation of development facilitated by the Project and Alternative 5 would be from additional vehicle and truck trips on the city roadways. Since, the City does not have a quantitative vibration standard in the General Plan or Sausalito Municipal Code, this analysis has utilized guidance provided by Caltrans identifying a threshold for historic structures of 0.12 inch per second PPV for transient sources.

The FTA Transit Noise and Vibration Impact Assessment Manual includes typical levels of groundborne vibration from various sources. As shown in Table 3.11-14 in Section 3.11,

Noise**Error! Reference source not found.**, the threshold for human perception of vibration is below many source levels including transportation and construction sources. Other factors impacting groundborne vibration from transportation sources include the condition of the roadbed, vehicle speed, suspension, and wheel condition and type.

A bus or truck over a bump may create a vibration level as high as 72 VdB (0.015 inch per second PPV), with typical bus and truck vibration in the range of 62 VdB (0.005 inch per second PPV). Both the typical and maximum vibration levels created from a bus or truck operating on a city roadway would be within the Caltrans threshold for historical structures of 0.12 inch per second PPV for transient sources. As such, any operational vibration impacts from increased vehicle traffic resulting from the Project or Alternative 5 are expected to be less than significant. Therefore, operation-related vibration impacts would not expose persons to excessive vibration and impacts would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures

MM 4.5-56 Implement Mitigation Measure 3.11-2.

> **MM 3.11-2 Construction Vibration.** Prior to issuance of grading permits for any project that is located within 150 feet of a historic structure that is depicted in Figure 4-1 of the General Plan and, if construction activities will require either: (1) pile driving within 150 feet; or (2) utilization of mobile construction equipment within 50 feet of the historic structure, the property owner/developer shall retain an acoustical engineer to prepare a vibration plan for city review and approval. The vibration plan shall determine the vibration levels created by construction activities at the historic structure. The vibration plan shall require the developer to implement specific measures to reduce the vibration levels to within Caltrans' threshold of 0.12 inches per second PPV for historic buildings. These measures could include, without limitation, utilization of equipment that create lower vibration levels, setbacks of stationary equipment from sensitive receptors, and setbacks of equipment staging areas from sensitive receptors, and/or shoring and foundation protections.

Level of Significance after Mitigation
Less than Significant

The General Plan includes Policy HS-3.6 and Program HS-3.6.1, which require that any property owner or developer of any new construction project located within 150 feet of a historical structure identified in Figure 4-1 of the General Plan, to submit a vibration analysis for potential impacts from vibration generated by construction equipment prior to issuance of grading permits. This requirement would apply to both the Project and Alternative 5. The projects that have the potential to impact historical structures during construction activities include those that will either: (1) conduct pile driving within 150 feet; or (2) utilize mobile construction equipment within 50 feet of any existing structure with sensitive receptors. As discussed above, there are alternative types of pile drivers, such as sonic pile drivers, that are capable of performing pile driving functions at much lower vibration levels. Similarly, using smaller pieces of earthmoving equipment, such as using a small dozer in place of large dozer, can reduce vibration levels in vibration sensitive areas. Mitigation Measure 4.5-56 is added to reinforce the requirements of Program HS-3.6.1. Therefore, with implementation of Mitigation Measure 4.5-56 and Program HS-3.6.1, construction-related vibration impacts would not expose persons to excessive vibration for future development under the Project and Alternative 5. Vibration impacts would be ***less than significant*** for both the Project and Alternative 5.

Impact 4.25-57	**Implementation of Alternative 5, in combination with other cumulative development, would not result in cumulatively substantial increases in ambient noise levels or vibration in excess of standards established by the local general plan, noise ordinance, or applicable standards of other agencies. (See Impact 3.11-3 for cumulative plus Project impacts related to this topic)**

The geographic context for the analysis of cumulative impacts related to noise includes the incorporated and unincorporated lands comprising the Sausalito Planning Area. This analysis evaluates whether the impacts of the project, together with the impacts of cumulative development, could result in a cumulatively significant impact related to noise, or result in a cumulatively significant impact related to noise. This analysis then considers whether the incremental contribution of the impacts associated with the implementation of the project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of significance.

Cumulative development would be required to comply with the design review regulations directing the siting, design, and insulation of new development and all applicable noise policies in local and regional plans, including the Marin Countywide Plan and Marin County Development Code to ensure that noise impacts are less than significant. In addition, construction noise and vibration are typically localized and temporary in nature. For these reasons, cumulative impacts to noise would be ***less than significant*** for both Alternative 5 and the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Population, Housing, and Employment

Information regarding the existing setting, regulatory setting, and thresholds of significance for Population, Housing, and Employment impacts can be found on pages 3.12-1 through 3.12-18 in Section 3.12, Population, Housing, and Employment, of the Draft EIR.

Impact 4.5-58 Implementation of Alternative 5 would not induce substantial unplanned population growth either directly or indirectly (for example, through extension of roads or other infrastructure) and would not displace a substantial number of people requiring the construction of new housing. (See Impact 3.12-1 for Project impacts related to this topic)

Development accommodated under the Project and Alternative 5 would result in an incremental increase in new residential uses. Implementation of the Project would result in the development of up to 1,147 units on identified Opportunity Sites throughout the city. Assuming an average household size of 1.71, a total of approximately 1,962 persons could be accommodated at buildout of the Project.

Alternative 5 would rezone the same parcels as those under the Project, with the addition of Site 14 and Site 52. Through a reallocation of units, Alternative 5 could result in up to 1,133 residential units, and a population increase of 1,938 residents. Alternative 5 would result in fewer residential units and fewer new residents than under the Project. Under Alternative 5, no existing residential units are present on either Site 14 or Site 52, and no people would be displaced as a result of Alternative 5.

As demonstrated in Table 3.12-7 in Section 3.12, Population, Housing, and Employment, ABAG projects that from 2015 to 2050, households in Marin County will increase from approximately 109,000 to 146,000, an increase of 37,000 households. Households in the South Marin area, including Sausalito, are projected by ABAG to increase by 21 percent from 2015 to 2050, from 41,000 to 50,000 households. The City's General Plan includes policies and programs adequate to meet this expected and planned for growth for the City's portion of the County's population growth, while both the Project and Alternative 5 involve the City completing rezoning or adoption of overlay zones to allow development of residential units on identified opportunity sites.

Both the Project and Alternative 5 identify areas for future residential development and both the General Plan and the Housing Element include a range of policies and programs to ensure that new development would not induce substantial unplanned population growth either directly or indirectly. These policies and programs would apply equally to the Project and to Alternative 5. General Plan Policy LU-9.1 requires that all Land Use policies be enforced. Housing Element Policies H-1.2 through H-1.4 protect existing housing stock in the city, including rental and affordable housing. Housing Element Policy H-2.2 aims to provide adequate housing sites through regional housing growth needs and Policy H-2.3 supports innovative strategies for the adaptive reuse of commercial structures to provide for a range

of housing types and residential uses, allowing for distributed population growth. Additionally, Policies H-2.8 and H-2.9 protect and support the creation and legalization of ADUs and liveaboard housing, which also allow for distributed population growth. Lastly, Housing Element Policies H-3.2 through H-3.5 address residential development standards, efficient use of land and zoning, and design review and zoning for special needs to properly manage population growth. These General Plan and Housing Element policies and programs support the objectives of the City to meet its RHNA allocation. Neither the Project nor Alternative 5 would result in any physical improvements that would displace residents or result in substantial adverse impacts to population or housing as future development would occur on vacant or underutilized parcels throughout the city. Future development in accordance with the Project and Alternative 5 would be subject to these General Plan policy requirements.

Additionally, the City's existing General Plan would accommodate public improvements throughout the city to accommodate growth resulting from implementation of Program 4 of the Housing Element. For example, some public improvements that could be undertaken to support the growing city include the reconstruction of the Municipal Fishing Pier (General Plan Program EQ-3.1.5); minor expansion of existing recreational marinas in the Marinship (General Plan Policy LU-4.3); floating structures or temporary buildings along the waterfront to adapt to a shifting waterfront boundary (General Plan Program W-4.6.1); undergrounding of utilities (General Plan Policy CD-5.2); maintenance and enhancement of existing public stairways and pathways (General Plan Policy CD-7.1), bicycle and pedestrian facilities (General Plan Objectives CP-5 and CP-8), street network (General Plan Policy CP-1.1) and parks (Objective EQ-3), including Dunphy Park (General Plan Program CD-4.3.1b) and Vina Del Mar Park (General Plan Program CD-4.3.1d). These public improvements planned as part of the General Plan would enhance the city's character and access to resources. These public improvements would not facilitate or contribute to population growth under either the Project or Alternative 5. Future development in accordance with the Project and Alternative 5 would be subject to these General Plan policy requirements.

Housing Element Policy 1.3 encourages repair and rehabilitation of existing housing stock. Implementation of this policy is expected to reduce displacement of residents from substandard or unsafe housing. Housing Element Policy 1.4 protects existing rental housing from conversion to non-residential use or ownership. Implementation of this policy will reduce potential for non-residential uses to displace residential units. It is also noted that any removal of housing resulting from implementation of the Project or Alternative 5 would be replaced with an equal or greater amount of housing. Therefore, neither the Project nor Alternative 5 would displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The fundamental purpose of the Project and Alternative 5 is to plan for affordable housing associated with the City's future growth and to meet the City's RHNA allocation. Implementation of the Project or Alternative 5 would not directly or indirectly induce

unplanned growth, and would not authorize any development that would displace residents and require the construction of new housing. Additionally, future development proposed under the Project or Alternative 5 would be required to comply with requirements of the General Plan and Sausalito Municipal Code protecting against substantial unplanned growth and displacement of existing residential uses. Therefore, the addition of growth under Alternative 5 would be similar to the amount of growth anticipated under the Project. Therefore, the impact on unplanned population growth and housing displacement would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-59	**Development facilitated by Alternative 5 would not cumulatively induce substantial unplanned population growth either directly or indirectly and would not cumulatively displace a substantial number of people requiring the construction of new housing. (See Impact 3.12-2 for cumulative plus Project impacts related to this topic)**

The geographic context for analysis of cumulative impacts related to population and housing includes the unincorporated lands surrounding the Planning Area, including Marin City. This analysis evaluates whether impacts of Alternative 5, together with impacts of cumulative development, would result in a cumulatively significant impact with respect to population and housing. This analysis then considers whether incremental contribution of the impacts associated with implementation of Alternative 5 would be significant. Both conditions must apply for cumulative effects to rise to the level of significance.

As demonstrated in Table 3.12-7 in Section 3.12, Population, Housing, and Employment, ABAG projects that from 2015 to 2050, the population and households in the Bay Area, Marin County, and the South Marin area will increase. The Bay Area region is projected to experience significant growth, increasing by 2,670,000 people to a total of approximately 10,330,000 by 2050. Marin County is projected to increase from approximately 109,000 to 146,000 households, an increase of 37,000 people, or approximately 34 percent. Population growth in the South Marin area is projected to increase by 21 percent by 2050, from 41,000 households in 2015 to 50,000 in 2050.[42]

[42] Metropolitan Transportation Commission, Association of Bay Area Governments, 2021. Plan Bay Area 2050 Forecasting and Modeling Report. October 2021. Available:

Assuming an average household size of 1.71, a total of approximately 1,962 persons and 1,147 housing units could be accommodated at buildout of the Project. Through a reallocation of units, Alternative 5 could result in up to 1,133 residential units, and a population increase of 1,938 residents. This would represent approximately 13 percent of the projected 2050 household growth for the South Marin area and less than 0.1 percent of growth throughout the Bay Area. This increase in population would result in a rate of increase similar to the Bay Area rate. The limited number of remaining available sites to accommodate additional housing within the City of Sausalito indicates that regional growth will continue to occur in other parts of the region.

The general plans and other planning documents (including housing elements) prepared by the adjacent cities and counties would be required to develop a land use plan that would accommodate the existing and forecasted population. Consistent with State law, these planning documents would be required to include provide adequate housing to accommodate forecasted numbers of people within the jurisdiction, and displaced development, if any, would be replaced primarily within the jurisdiction. Because cumulative projects would comply with all applicable land use plans to provide adequate development within a jurisdiction, a significant cumulative impact would not occur.

Moreover, adoption of Alternative 5 or the Project would not result in any policies or physical improvements that would result in direct or indirect or cumulative impacts to regional growth, as Alternative 5 has been prepared to accommodate the City's share of regional planned growth. Alternative 5 would not result in substantial displacement of people as no sites are required to be developed by the Housing Element and any housing units on sites that are developed as envisioned by Alternative 5 would be replaced with an increase in units, accommodating more than the original population of the site and thus not resulting in the need to construct additional housing. Alternative 5's contribution to the overall population growth in the Bay Area would be less than considerable, and the cumulative impact would be ***less than significant***, as it would be under the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

https://planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_Forecasting_Modeling_Report_October_2021.pdf. Accessed June 10, 2024.

Public Services and Recreation

Information regarding the existing setting, regulatory setting, and thresholds of significance for Public Services and Recreation impacts can be found on pages 3.13-1 through 3.13-19 in Section 3.13, Public Services and Recreation, of the Draft EIR.

Impact 4.5-60 Implementation of Alternative 5 would not result in the provision of or need for new or physically altered fire protection facilities, police protection facilities, school facilities, or library facilities, the construction or operation of which could cause significant environmental impacts. (See Impact 3.13-1 for Project impacts related to this topic)

Development accommodated under the Project and Alternative 5 would result in an incremental increase in new residential uses. Implementation of the Project would result in the development of up to 1,147 units on identified Opportunity Sites throughout the city. Assuming an average household size of 1.71, a total of approximately 1,962 persons could be accommodated at buildout of the Project.

Alternative 5 would rezone the same parcels as those under the Project, with the addition of Site 14 and Site 52. Through a reallocation of units, Alternative 5 could result in up to 1,133 residential units, and a population increase of 1,938 residents. Alternative 5 would result in fewer residential units and fewer new residents than under the Project.

Residential development and growth in the City under both the Project and Alternative 5 would incrementally increase demand for public services, including fire protection, law enforcement, schools, libraries, and other public and governmental services. As the demand for services increases, there may be a need to increase staffing and equipment to maintain acceptable service ratios, response times, and other performance standards.

The General Plan includes a range of policies and programs to ensure that public services are provided in a timely fashion, are adequately funded, are coordinated between the City and appropriate service agency, and that new development funds its fair share of services. These policies and programs would apply equally to the Project and Alternative 5. The General Plan includes policies to ensure that fire protection and law enforcement services keep pace with new development and that school, library, and governmental services are adequately planned and provided. Future development in accordance with the Project and Alternative 5 would be subject to these General Plan policy requirements.

Accordingly, and based on consultation with the SMFD and SPD, and the anticipated population growth from implementation of the Project, the construction of new or expanded fire protection, police protection, school, library, or other municipal service facilities would not be required. Because Alternative 5 would generate fewer residential units and fewer new residents, it can be deduced that the construction of new or expanded fire protection, police protection, school, library, or other municipal service facilities would not be required for Alternative 5.

Fire Protection Services

The pattern and amount of development envisioned by the Project and Alternative 5 would not result in a significant impact to fire protections services. Based on discussions with SMFD, the anticipated population growth from the Project would not necessitate the construction of new or expanded fire protection facilities. Because Alternative 5 would generate fewer residential units and fewer new residents, the demand for fire protection services would be slightly less, and the construction of new or expanded fire protection services would not be required. The SMFD met response standards in 2017, 2018, and 2019, 100 percent of the time.[43] The most recent, comprehensive analysis of the SMFD was the preparation of a response time study commissioned by the SMFD in 2016 concluded that current facilities and engine locations are adequate to meet existing needs, and that relocating or adding a station is not a necessary or cost-effective investment. Instead, the study recommended that SMFD focus on reducing crew turnout times to fall consistently below 2 minutes.[44] Turnout times, the elapsed time from when an emergency vehicle is dispatched to when it goes enroute to the scene of the incident, has fluctuated slightly over the last four years, averaging 2 minutes and 32 seconds.[45] In addition, the response time study recommended that the SMFD implement policy recommendations, adopt updated performance measures, and identify funding and timing for an added crew member per day at Station 4. The SMFD measures its performance monthly to identify how well the Department is achieving its benchmarks, how quickly each station and the Department as a whole responds to emergency situations, and reviews the types of incidents the Department responds to in order to gain insight into Department efficiencies and effectiveness of service.[46] The study concluded that the implementation of deployment recommendations contained in the study and monitoring staff workload to ensure capacity is not exceeded would ensure the SMFD could continue to meet its goals under both the Project and Alternative 5.

Further, informationally, the City notes that the increased property taxes from development facilitated by the Project or Alternative 5 would result in additional funding being available to the SMFD to accommodate future growth.

Police Services

The pattern and amount of development envisioned by the Project would not result in a significant impact to police services. Based on the analysis below and discussions with

[43] Email correspondence with Southern Marin Fire Protection District (SMFD) Fire Chief Chris Tubbs. April 11, 2020.

[44] Citygate Associates. 2016, Fire and Emergency Medical Services Deployment Analysis: Southern Marin Fire Protection District, Vol.1 Executive Summary, p. 11. September 22.

[45] Southern Marin Fire District Incident & Response Analytics, 2024. Response Report. Response Time Categories: YTD Comparison. Available: https://dashboards.mysidewalk.com/southern-marin-fire-performance/response-report. Accessed: September 3, 2024.

[46] Southern Marin Fire District Incident & Response Analytics, 2024. Response Report. Response Time Categories: YTD Comparison. Available: https://dashboards.mysidewalk.com/southern-marin-fire-performance/home. Accessed: September 3, 2024.

Sausalito Police Department, the anticipated population growth from the Project would not necessitate the construction of new or expanded police facilities. Because Alternative 5 would result in fewer residential units and fewer new residents, the demand for police protection services would be slightly less than the Project, and the construction of new or expanded police facilities would not be required. The SPD provides police services to the City of Sausalito. It offers a variety of resources and avenues of assistance to residents and business owners to help prevent crime, including the Surveillance Camera Registry program, the Marine Patrol, the Homeless Advocacy program, and the Postal Carrier Alert program. Furthermore, the SPD collaborates with local neighborhood watch groups in a community-based approach to law enforcement and each year, the Department runs a Citizen's Police Academy, designed to provide an inside look at how the department operates. As the waterfront and Marinship areas of the City continue to grow throughout Project or Alternative 5 buildout, the Department's need for a part-time Marine Patrol Police Officer and part-time civilian Harbor Assistant will become more pressing. However, the Department has been working to staff these positions since 2017 and continues to search for individuals to fill them.[47] The Department expects to eventually create a new patrol beat including City waters, the shoreline, and new development in the Marinship to be staffed seven days a week by three new full-time officers.[48] The demand for water patrol resources would be identical under Alternative 5 as under the Project. For assistance for marine responses, the SPD currently partners with the Marin County Sheriff's Office.

Additionally, the potential increase in SPD staffing required to serve future development of the Project or Alternative 5 would likely be 19 percent or less, which is the ratio of existing homes to proposed new housing under the Project, with no appreciable difference for development under Alternative 5. This growth would represent four new SPD staff positions. Because both the Project and Alternative 5 involve infill housing in already developed locations within existing service areas, no new service stations would be required to service new geographic areas.

Further, in conjunction with the SMFD, Sausalito residents and businesses, and other concerned members of the public, the Department operates the VIPS program to train volunteers to help resolve problems in our community using every available resource.

School Facilities

The pattern and amount of development envisioned by the Project would not result in a significant impact to school facilities, as new development provides impact mitigation fees of offset the impacts to school facilities. Commensurate with the growth anticipated under Alternative 5, impact fees would also be paid to offset the impacts on school facilities. The

[47] Email correspondence from Sausalito Police Department Acting Chief Gregory to Elise Laws, De Novo Planning Group. November 10, 2022.

[48] Email correspondence from Sausalito Police Department Acting Chief Gregory to Elise Laws, De Novo Planning Group. November 10, 2022.

anticipated population growth from the Project would be less than 25 percent of the City's current population and would not necessitate the construction of new or expanded school facilities. Growth under Alternative 5 would be slightly less than under the Project, and would not necessitate the construction of new or expanded school facilities. The California State Legislature, under SB 50, has determined that payment of school impact fees provides full and complete mitigation for impacts to school facilities. All development facilitated by the Project and Alternative 5 would be required to pay the school impact fees adopted by each school district, and this requirement is considered to fully mitigate the impacts of the Project and Alternative 5 on school facilities.

Library Services

The pattern and amount of development envisioned by the Project would not result in a significant impact on library services. Although the Project would increase the population in the City, the estimated new residents would represent less than 25 percent of the existing population. Growth under Alternative 5 would add even fewer residents to the city. Additionally, the Sausalito Library was renovated in 2013 to accommodate future growth in the City as well as provide more services to residents. Therefore, development anticipated under both the Project and Alternative 5 would not be expected to result in the need for new or expanded library facilities or services.

Other Municipal Services

The pattern and amount of development envisioned by the Project would not result in a significant impact to other municipal services. The anticipated population growth from the Project would be less than 25 percent of the City's current population, and even less under Alternative 5. As a result, the budgets for the Administration Department, Community Development Department, and Public Works Department are expected to be minimally impacted. Further, the allocation of other municipal services is determined annually by the City Council based upon local needs and resources. Since both the Project and Alternative 5 assume that any additional development would be primarily infill in nature (i.e., replacing existing development and building on existing vacant parcels), impacts to other municipal services is not expected to be significant. For the same reasons, Alternative 5 would not result in the need for new or expanded other municipal service facilities.

Conclusion

In conclusion, no new construction of or expansion to fire protection, police protection, library, school, or other municipal service facilities would be required under the Project or Alternative 5. Development envisioned by both the Project and Alternative 5 would result in an incremental increase in the demand for public services in the Planning Area, and as demand for services increases, there may be a need to increase staffing and equipment to maintain acceptable service ratios, response times, and other performance standards. However, based on consultation with the SMFD and Sausalito Police Department, and the anticipated population growth from the Project and Alternative 5, the construction of new or

expanded fire protection, police protection, school, library, or other municipal service facilities would not be required. Because Alternative 5 would introduce slightly fewer residential units and new residents to the city, the impact of Alternative 5 would be slightly less than under the Project.

Further, as the City receives development applications for subsequent development under the Project or Alternative 5, those applications will be reviewed by the City for compliance with the policies and programs of the General Plan to ensure that that fire protection and police protection services keep pace with new development and that school, library, and other municipal services are adequately planned and provided. Therefore, impacts related to public services would be slightly less under Alternative 5 compared to the Project and would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-61	**Implementation of Alternative 5 would not 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. (See Impact 3.13-2 for Project impacts related to this topic)**

The City of Sausalito has not adopted a Quimby Act ratio. The City has an existing parkland ratio of 5.09 acres of parkland per 1,000 residents, based upon park and beach facilities totaling 34.95 acres and a population of 6,865 in January 2023.[49] Within the City limits, the GGNRA covers approximately 182 acres of open space, while the City owns approximately 17 acres of open space (not associated with GGNRA). Although most of GGNRA and all of Fort Baker are not located within the Planning Area, these national parks are adjacent to the City and provide approximately 7,653 additional acres of open space and open space amenities that supplement the City's parks.

New development accommodated under the Project and Alternative 5 would result in an incremental increase in new residential uses. The Project is expected to accommodate approximately 1,147 new residential dwelling units within the Planning Area, resulting in an increase of 1,962 residents. Alternative 5 would rezone the same parcels as those under the Project, with the addition of Site 14 and Site 52. Through a reallocation of units, Alternative

[49] State of California Department of Finance. 2023. E-4 Population Estimates for Cities, Counties, and the State, 2021-2023, with 2020 Benchmark. May 1.

5 could result in up to 1,133 residential units, and a population increase of 1,938 residents. Alternative 5 would result in fewer residential units and fewer new residents than under the Project. Alternative 5 would also slightly reduce impacts to the existing MLK Property~~ark~~ facilities on Site 84, as development would be reduced from 94 units under the Project to 80 units, or fewer, under Alternative 5.

This new growth would incrementally increase demand for parks and other recreational facilities in the Planning Area. The City projects a population of 7,883 by 2040 based on buildout of the General Plan, including implementation of the Project, or slightly less under Alternative 5.

The anticipated population growth from the Project and from Alternative 5 would be approximately 28 percent of the City's current population. This limited population growth would not substantially increase existing use of park facilities, nor cause or accelerate their deterioration.

Moreover, the General Plan includes policies and programs that protect parks and recreational facilities, and future development in accordance with the Project and Alternative 5 would be subject to these policies and programs. Policy EQ-3.1 requires the City to preserve and improve existing parks and parkland for City residents. In addition, Programs EQ-3.1.1 and EQ-3.1.2 would ensure that park facilities are continually improved by a Capital Improvement Program. The Sausalito Municipal Code also contains rules and regulations to protect and preserve parks and recreational facilities within the Planning Area. Chapter 10.20 aims to preserve existing City-owned open space and parks and provide guidelines for development and use of facilities on City and federally owned lands (see e.g., Policy LU 5-1 and Program LU 5.11). The City would need to provide an additional 5.735 acres of parkland to meet the recommended ratio of 5 acres per 1,000 residents as a result of implementation of the Project, or an addition of 5.665 acres under Alternative 5. When natural open space areas are factored in, the City would continue to exceed the recommended ratio of 5 acres per 1,000 residents.

In conclusion, development envisioned by both the Project and Alternative 5 could result in an increase in new development. However, given the incremental increase in residential growth anticipated during the buildout of the Project or Alternative 5, such population growth would not result in a significant acceleration in deterioration of parkland facilities. Furthermore, compliance with the General Plan policies and programs and adherence to the Sausalito Municipal Code would ensure that future developments under both the Project and Alternative 5 provide their fair share of maintenance and upkeep to City parks. Impacts under Alternative 5 would be slightly less than under the Project because slightly fewer acres of parkland would be required to maintain the City's desired ratio and there would be a small reduction in impacts to the MLK Property facilities on Site 84. Impacts to park facilities would be slightly less under Alternative 5 compared to the Project and would be ***less than significant*** for the Project or Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-62 Implementation of Alternative 5 would not include or require the construction or expansion of parks and other recreational facilities, which might have an adverse physical effect on the environment. (See Impact 3.13-3 for Project impacts related to this topic)

As discussed in the Regulatory Setting portion of Section 3.13, Public Services and Recreation, the General Plan contains policies that guide the maintenance and funding of parks and recreational areas within the Planning Area. The General Plan contains policies and programs that identify specific recreational facilities for development as well as the goal of developing a Parks and Recreation Facilities Master Plan. These policies and programs would apply equally to the Project and Alternative 5.

To maintain existing parks and recreational facilities within the Planning Area, the General Plan contains policies and programs that require maintenance and expansion of park, open space, and recreational facilities as well as recreational programs. For example, Policy EQ-3.1 ensures the City preserves and improves existing parks, parkland, and recreation areas for passive and active recreation use by City residents. Program EQ-3.1.1 requires the City to develop a maintenance program for parks and open space to proactively manage these areas for recreational use. Policies EQ 3.3 and 3.4 and Program EQ 3.3.1 provide for the continued maintenance and development of recreational facilities in the City. As such, development facilitated by implementation of the Project and Alternative 5 could include the construction of new or expanded parks and other recreational facilities in conjunction with development of various Opportunity Sites and Inventory Sites throughout the Planning Area.

There could be environmental impacts associated with the construction of new or expanded parks and other recreational facilities. It is not possible to identify the timing or relative specifics of these improvements as the details are unknown at this time and it would be premature to consider new or expanded parks on a project-specific level as part of the Project or Alternative 5, as these projects have not yet been designed and other key project components that would influence potential environmental impacts have not yet been determined. Accordingly, it would be inappropriate and speculative under CEQA to conduct a project-specific analysis for the creation of new or expanded parks in this Draft EIR. As the City proceeds with the construction of new or expanded parks and other recreational facilities, including those that would result from implementation of the Project or Alternative

5, those projects will be reviewed by the City of Sausalito for compliance with the policies and programs of the General Plan as well as the City's Municipal Code, which implements the City's General Plan, related to physical effects these projects may have on the environment. Likewise, as the City receives individual development applications for subsequent development under the Project or Alternative 5 that includes new or expanded parks and other recreational facilities, those future discretionary actions would be evaluated for project-specific environmental effects at the time they are proposed. Therefore, the physical effects on the environment from the construction of new or expanded parks and other recreational facilities would be the same under Alternative 5 as under the Project, and impacts for both the Project and Alternative 5 would be ***less than significant***.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-63	**Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to fire protection facilities, police protection facilities, school facilities, library facilities, parks, or recreational facilities. (See Impact 3.13-4 for cumulative plus Project impacts related to this topic)**

This analysis evaluates whether the impacts of implementation of Alternative 5, together with the impacts of cumulative development, would result in a cumulatively significant impact with respect to fire protection facilities, police protection facilities, school facilities, library facilities, parks or recreational facilities.

Cumulative development with unincorporated Marin County is identified in the Marin Countywide Plan Update Final EIR. Cumulative development would be required to comply with design review regulations and policies in local and regional plans, including the Marin Countywide Plan and Marin County Development Code to ensure that impacts are less than significant. Cumulative projects within unincorporated Marin County, including the community of Marin City would be required to comply with applicable Marin Countywide Plan policies and programs and adhere to development and design standards in the Marin County Municipal Code For these reasons, cumulative impacts to public services and recreation would be ***less than significant*** for Alternative 5 and the Project.

Fire Protection Services

The geographic context for the analysis of cumulative impacts related to fire protection services includes the SMFD service area, which comprises City of Sausalito, Fort Baker, and the Marin Headlands as well as the communities of Tamalpais Valley, Almonte, Homestead Valley, Alto, Strawberry, and a portion of the town of Tiburon. A significant cumulative environmental impact would result if this cumulative growth exceeded the ability of SMFD to adequately serve their service area, thereby requiring construction of new facilities or modification of existing facilities. All cumulative projects within the SMFD service area would be required to comply with City ordinances and General Plan policies that address fire protection services. Therefore, cumulative impacts would be ***less than significant*** for Alternative 5 and the Project.

Moreover, Alternative 5's incremental contribution to less-than-significant cumulative impacts would not be significant. As discussed under Impact 4.5-60, implementation of Alternative 5 would not create a need for new or physically altered facilities for the SMFD to provide fire protection services to its service area.

Further, as an informational note, the increased property taxes from development facilitated by Alternative 5 or the Project, as well as the cumulative development projects, would result in additional funding being available to the SMFD to allow for future growth.

As previously discussed, development facilitated by Alternative 5 would be required to comply with the policies and programs in the General Plan as well as the Sausalito Municipal Code, to ensure that fire protection services are adequate as future development is proposed. All cumulative projects within the SMFD service area would be required to comply with City ordinances and General Plan policies that address fire protection services. Therefore, impacts of Alternative 5 on fire protection services are not cumulatively considerable and the cumulative impact would be ***less than significant,*** as it would be under the Project.

Police Protection Facilities

The geographic context for the analysis of cumulative impacts related to police protection facilities includes the Sausalito Police Department service area, which comprises the City of Sausalito. Since police protection services in Sausalito are provided by the Department, changes and growth anticipated under Alternative 5 would not have any cumulative impact beyond Sausalito's SOI. A significant cumulative environmental impact would result if this cumulative growth exceeded the ability of the Department to adequately serve their service area, thereby requiring construction of new facilities or modification of existing facilities. All cumulative projects within the Department service area would be required to comply with City ordinances and other policies that address police protection services. Therefore, cumulative impacts would be ***less than significant.***

Alternative 5's incremental contribution to less-than-significant cumulative impacts would not be significant. As discussed under Impact 4.5-60, implementation of Alternative 5 would

not create a need for new or physically altered facilities for the Department to provide police protection services to its service area.

As previously discussed, development facilitated by Alternative 5 would be required to comply with the policies and programs in the General Plan as well as the Sausalito Municipal Code, to ensure that police protection services are adequate as future development is proposed. Therefore, impacts of Alternative 5 on police protection services are not cumulatively considerable and the cumulative impact would be ***less than significant***, as it would be under the Project.

School Facilities

The geographic context for the analysis of cumulative impacts related to school facilities includes the Sausalito Marin City School District, TUHSD, Marin Community College District, and private schools that serve Sausalito and surrounding cities. Regional growth resulting from past, present, and reasonably foreseeable projects would result in increased demand for additional school facilities within all three public school districts serving the City of Sausalito. Like development in Sausalito, the schools are expected to receive development impact fees from cumulative development within other jurisdictions. The payment of school impact fees would ensure that school facilities can accommodate future students. Therefore, cumulative impacts would be ***less than significant*** for Alternative 5 and the Project.

Development envisioned by Alternative 5 would contribute to an incremental cumulative increase in the demand for school facilities within the three school districts serving the City. Alternative 5's incremental contribution to less-than-significant cumulative impacts would not be significant. As discussed under Impact 4.5-60, all development facilitated by Alternative 5 will be required to pay the school impact fees adopted by each school district, and this requirement is considered to fully mitigate the impacts of Alternative 5on school facilities.

Therefore, impacts of Alternative 5 on school facilities are not cumulatively considerable and the cumulative impact would be ***less than significant***, as it would be under the Project.

Library Facilities

The geographic context for analysis of cumulative impacts to library facilities includes the Sausalito Library. A significant cumulative environmental impact would result if cumulative growth exceeded the ability of the Sausalito Library to adequately serve people within their service area, thereby requiring construction of new facilities or modification of existing facilities. All cumulative projects would be required to comply with City ordinances and other policies that address library facilities and services. Therefore, cumulative impacts would be ***less than significant*** for Alternative 5 and the Project.

Alternative 5's incremental contribution to less-than-significant cumulative impacts would not be significant. At buildout, development envisioned by Alternative 5 would result in a population increase of less than 25 percent, which would not significantly increase demand

for library services. For these reasons, impacts of Alternative 5 on library facilities are not cumulatively considerable and the cumulative impact would be ***less than significant***, as it would be under the Project.

Other Municipal Services

The geographic context for analysis of cumulative impacts to other municipal services is the City and SOI. Development envisioned by Alternative 5 would contribute to an incremental cumulative increase in the demand for other municipal services. All cumulative projects would be required to comply with City ordinances and other policies that address municipal services. Therefore, cumulative impacts would be ***less than significant*** for Alternative 5 and the Project. Alternative 5's incremental contribution to less-than-significant cumulative impacts would not be significant. At buildout, the anticipated population growth from Alternative 5 is less than ten percent of the City's current population. As a result, the cumulative impact on the City budget is expected to be minor. Furthermore, the allocation of other municipal services is determined annually by the City Council based upon local needs and resources. For these reasons, impacts of Alternative 5 on other municipal services are not cumulatively considerable and the cumulative impact would be ***less than significant***, as it would be under the Project.

Parks and Recreational Facilities

The geographic context for the analysis of cumulative impacts of parks and recreational facilities includes those located within the City boundary. A significant cumulative environmental impact would result if this cumulative growth resulted in an increase in the use of existing parks and recreational facilities, such that substantial physical deterioration of the parks or recreational facilities would occur, be accelerated, to require the construction of new parks and recreational facilities or modification of existing parks and recreational facilities. All cumulative projects would be required to comply with City ordinances and General Plan policies that address parks and recreational facilities, such as paying park in-lieu fees and maintaining adequate parkland ratios. Therefore, cumulative impacts to parks and recreational facilities would be ***less than significant*** for Alternative 5 and the Project. Alternative 5's incremental contribution to less-than-significant cumulative impacts would not be significant. As discussed under Impact 4.5-61, implementation of Alternative 5 would not 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. As discussed under Impact 4.5-62, the construction or expansion of parks and other recreational facilities are not expected to result in an adverse physical effect on the environment. As such, development anticipated under Alternative 5 would not create substantial impacts related to parks and other recreational facilities.

Further, potential future impacts to Sausalito parks and recreational facilities would be further reduced through the contribution of property taxes to ensure facilities at these locations are adequately maintained and sufficient to accommodate growth associated with

cumulative development. Therefore, impacts of Alternative 5 on parks and other recreational facilities are not cumulatively considerable and the cumulative impact would be ***less than significant*** for Alternative 5 and the Project.

In conclusion, cumulative development, including implementation of Alternative 5, is not expected to result in the need for new or expanded fire protection facilities, police protection facilities, school facilities, library facilities, other municipal service facilities, parks or recreational facilities. If future requests for land use amendments cause the need for new facilities, development of such facilities would be located within the planning area analyzed in this Draft EIR. The General Plan includes policies and programs that are specifically designed to reduce or avoid environmental impacts of construction, including construction of public facilities. The policies related to each environmental topic area are shown throughout this Draft EIR. There are no additional significant impacts related to construction of public service, recreational or park facilities beyond the construction impacts that are analyzed throughout this Draft EIR. As appropriate, future facility construction plans would be subject to project-level CEQA analysis and additional feasible mitigation, if appropriate. Therefore, there would be no significant adverse physical cumulative environmental effects associated with construction and operation of new fire protection facilities, police protection facilities, school facilities, library facilities, other municipal service facilities, parks or recreational facilities, and this impact is considered ***less than significant***, as it would be under the Project.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Transportation and Circulation

Information regarding the existing setting, regulatory setting, and thresholds of significance for Transportation and Circulation impacts can be found on pages 3.14-1 through 3.14-17 in Section 3.14, Transportation and Circulation, of the Draft EIR.

Impact 4.5-64	**Implementation of Alternative 5 would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. (See Impact 3.14-1 for Project impacts related to this topic)**

Auto Circulation

The Project and Alternative 5 would be substantially consistent with the Sausalito General Plan's policies regarding auto circulation. The General Plan Circulation and Parking Element contains policies and programs intended to maintain and improve the city's roadway network without major roadway widening (Policy CP-1.1), develop a VMT standard (Program CP-1.4.1), include Complete Streets multimodal improvements in capital projects wherever possible (Program CP-5.10.1), and consider a strategy to improve circulation in the Marinship (Program 6.3.1). Policy CP-6.1 requires developers to contribute to the cost of transportation improvements. These policies and programs would help manage the roadway needs created by development of the housing sites identified in the Housing Element.

Under Alternative 5, Site 14's location on a collector street near Highway 101 would likely have minimal effects on traffic congestion as compared to the Project. Monte Mar Drive/Spencer Avenue, immediately to the west of Site 14, is not stop-controlled, and traffic would continue to flow freely to the north and south. Westbound Spencer Avenue would continue to be stop controlled, ensuring that traffic would continue to yield to flow-through traffic. Site 52 is located closer to the City's central business district and activity areas so the site is likely to have higher levels of non-auto trips, though those that do drive would in many cases travel through multiple intersections along Bridgeway, potentially contributing to congestion on the corridor. Site 84 is located near existing signals on Bridgeway and relatively close to Highway 101, likely limiting the extent to which added auto trips would contribute to congestion. Increasing the proportion of income-restricted units at Sites 303 and 202 could slightly reduce auto trip generation levels and effects on surrounding roadways. In aggregate, the unit shifts associated with Alternative 5 would likely result in modest changes in traffic patterns, though in most cases it is likely that increases to delay and congestion would be immeasurable given the relatively small number of units and auto trips generated.

General Plan Policy CP-1.6 calls for the city to maintain an LOS D standard for signalized intersections during the weekday p.m. peak hour except on Johnson, Bay, and Princess Streets; however, the Project, and, Alternative 5, would amend this policy to clarify that shall

apply to the extent that the City can feasibly make improvements, such as where existing right-of-way can feasibly accommodate improvements to maintain LOS "D" or where right-of-way can be obtained without requiring loss of dwelling units or commercial structures. Note that while LOS is no longer considered in CEQA assessments, Sausalito still maintains this LOS D standard, and may continue to require the preparation of traffic impact studies for development projects in the same manner that is currently applied. Any circulation constraints or deficiencies that are identified in such studies, including measures needed to maintain roadway performance, would typically be addressed as conditions of approval rather than CEQA mitigation measures. Neither the Project nor Alternative 5 would preclude traffic impact studies from being prepared and would not preclude the city from requiring transportation improvements to be completed by development projects (including modifications to improve traffic operation, access, and bicycle, pedestrian, and transit improvements), so would not be in conflict with Policy CP-1.6.

Bicycle and Pedestrian Circulation

The Project and Alternative 5 would be substantially consistent with policies and programs in the Sausalito General Plan pertaining to bicycle and pedestrian facilities. The General Plan identifies several policies and programs intended to improve facilities for non-auto modes and promote non-auto travel, which would be equally applicable to the Project and Alternative 5. These include improving and maintaining bicycle infrastructure according to the Bicycle Master Plan (Policy CP-5.1), supporting the Safe Routes to School program (Program CP-5.2.2), and implementation of the Bridgeway and North-South Family Bikeways (Programs CP-5.3.1 through CP-5.3.3 and Policy CP-5.4). Regarding pedestrian facilities, the General Plan calls for improvements to the city's existing stair systems and public easements (Program CP-5.7.1), establishment of new connector segments through potential city purchases (Program CP-5.7.2) and requiring development projects to dedicate access easements (Program CP-5.7.3), ensuring that city sidewalks and pathways are accessible for people of all abilities (Policy CP-5.9), and promoting safe pedestrian walkways throughout the city (Program 7.4.2). Neither the Project nor Alternative 5 would conflict with these policies and programs.

General Plan Policy CP-5.11 requires new development and substantial remodels in the Marinship to establish and enhance pedestrian and bicycle pathways, and Program CP-5.9.1 calls for the city to continue requiring all development projects to be compliant with accessibility standards. Program CP-5.11.1 further calls for creation and maintenance of pedestrian and bicycle paths as part of development projects in the Marinship. Neither the Project nor Alternative 5 would conflict with these policies and programs.

Individual development projects proposed under the Project or Alternative 5 would be subject to review by the City of Sausalito during the entitlement process to ensure that adequate pedestrian and bicycle facilities are provided, and to confirm that the projects are

consistent with the General Plan policies and programs outlined above. As appropriate, the city would identify required improvements such as (for example) internal and offsite connections, completion of planned bicycle facilities along project frontages, provision of pedestrian connections to bus stops, implementation of crossing improvements including accessible curb ramps, and provision of bike parking. There would be no discernible differences in bicycle and pedestrian impacts between the Project and Alternative 5.

Public Transit System

With respect to policies and programs relating to Public Transit, the Sausalito General Plan encourages the maintenance of safe and efficient bus services (Policy CP-3.1) and improvement of ferry and bus connection points by the transit district (Program CP-4.1.3). Program CP-3.1.2 calls for the city to coordinate with transit agencies to provide bus stop amenities that facilitate greater use by Sausalito riders, Program CP-3.2.1 calls for exploring alternative forms of transit including shuttles, Program 3.2.2 addresses promoting school bus usage, and Program 7.4.1 includes working with transit and other agencies to better connect Sausalito residents to workplaces and vice versa. Program CP-6.1.2 indicates that during review of proposed development, the city should encourage improvements that will maximize public transit ridership.

Individual development projects proposed under the Project or Alternative 5 would be subject to review by the City of Sausalito and applicable transit agencies to ensure that adequate access to available transit would be provided. During these project-specific reviews, overseeing agencies would identify required improvements such as (for example) bus pullouts, transit shelters, and sidewalks or pedestrian paths connecting to transit stops.

Because neither the Project nor Alternative 5 would conflict with policies, plans, or programs regarding roadways, bicycle and pedestrian facilities, and public transit, and because individual developments will be reviewed through the entitlement process to determine necessary transportation improvements, the impact would be the same under the Project and Alternative 5, and would be ***less than significant***.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-65 Implementation of Alternative 5 would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (a). (See Impact 3.14-2 for Project impacts related to this topic)

With implementation of the Project, the residential VMT per capita in the City of Sausalito is projected to be 13.2 miles, which is a reduction from existing levels. The applicable significance threshold of 12.6 VMT per capita would, however, be exceeded by approximately 4.8 percent overall. Based on review of VMT per capita results at smaller geographic levels (the micro-analysis zone—or MAZ—level in the TAMDM model), some residential VMT at Opportunity Sites may exceed significance thresholds by as much as 51 percent.

The 23.5 VMT per employee associated with Housing Element sites containing added nonresidential uses would also be lower than existing citywide levels. VMT per employee would, however, exceed the applicable significance threshold of 15.4 VMT per employee by approximately 52.8 percent overall.

For Alternative 5, units at Sites 14 and 52 are projected to produce somewhat lower VMT per capita than units at Site 84. This means that shifting any number of units from Site 84 to Sites 14 and/or 52 under Alternative 5 would reduce VMT levels under Alternative 5 as compared to the Project. If the number of units on Site 84 is reduced to zero and Sites 14 and 52 are each allocated 25 added units, citywide home-based VMT is estimated to be reduced by about 1,130 miles under Alternative 5 as compared to the Project. This could be considered a slight reduction in VMT impacts compared to the Project, though when considered at the citywide level, the decrease would not result in a measurable change to Sausalito's VMT per capita. With respect to the effects associated with increasing the proportion of affordable units on Sites 303 and 202 under Alternative 5, per-capita VMT levels at these sites would be expected to decrease slightly as compared to the Project given the relationship between affordable housing and lower levels of VMT production, though again these changes are not anticipated to result in measurable changes to VMT per capita at the citywide level.

Because buildout of sites associated with the Project and Alternative 5 would fall short of meeting VMT significance thresholds for residential and nonresidential uses, both Alternative 5 and the Project would be considered to have a ***potentially significant impact*** on VMT.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-65 Implement Mitigation Measures 3.14-2a and 3.14-2b.

> **MM 3.14-2a** Residential projects that do not include any retail space (all-residential projects) proposed on Inventory Sites or Opportunity Sites in the Amended Housing Element shall:

- Require the individual project developer to participate in a VMT Exchange whereby developers can pick a VMT mitigation action from an approved list and either pay for someone else to implement that action or do it themselves. These actions shall include financial incentives for individuals, contributions to funds for identified capital improvement projects, and contributions to funds for enhancing transit services.

- Prior to issuance of a building permit, require the individual project developer to submit, in writing, proof of contribution to a VMT Exchange, including disclosure of how the funding will be used.

MM 3.14-2b Nonresidential or mixed use projects proposed on Inventory Sites or Opportunity Sites in the Amended Housing Element shall implement a Transportation Demand Management Program (TDM Program). The TDM Program shall include strategies, incentives, and tools to provide opportunities for employees and patrons to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to non-residential uses to the individually proposed project.

The TDM Program shall include:

1. TDM 1/Encourage Alternative Modes of Transportation (Public Bus and Vanpool) – The individually proposed project shall encourage alternative modes of transportation use by providing monetary incentives to employees and patrons such as:

    - Discounted goods or services with proof of a same-day transit ticket or registered transit card (the regional fare payment method).

    - Transit and/or Multi-Modal Subsidy, providing pre-tax commuter benefits for employees.

    - Marketing and outreach campaign for transit usage and ridesharing.

    - Provision of fair-share on-site and/or off-site improvements to bus stops within ¼-mile of an individually proposed project. Such improvements may include the provision of new or improved lighting, new benches and overhead canopies, additional bench capacity if

needed, new or expanded bike racks, or similar physical improvements.

2. TDM 2/Encourage Carpools and Zero-Emission Vehicles – Individually proposed projects shall provide incentives that would encourage carpooling and zero-emission vehicles as a means for sharing access to and from the site, including the following:

- Provide incentives for carpools or zero-emission vehicles, including preferential parking with the number of parking spots in excess of applicable requirements, reduced or subsidized parking costs, or other discounts/benefits.

- For projects that include dedicated parking areas with more than ten (10) parking spaces provided, provide one (1) parking space with an electric vehicle charging station.

3. TDM 3/Encourage Active Transportation – The Project shall include features which enhance access for bicyclists and pedestrians including the following:

- Provide bicycle parking in excess of applicable code requirements.

- Coordinate bike pools and walk pools.

- Provide sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities and throughout the project site.

Employers shall report the efficacy of its trip reduction program to the City of Sausalito. The "employer program manager" – the employee with policy and budget authority who is responsible for the implementation of the employer trip reduction program or employer trip reduction plan and for fulfilling the requirements of this rule – shall conduct an employee trip survey using a uniform survey form prepared by the Marin County CMA. A summary of the trip results shall be submitted annually to the City of Sausalito.

Level of Significance after Mitigation
Significant and Unavoidable

Implementation of Mitigation Measure 4.5-65 would reduce the VMT impacts associated with future development projects under both the Project and Alternative 5, but quantifying the reduction would be difficult as some of these measures may not be feasible depending on the specifics of individual development projects, such as the type and location of individual project proposed. There are two important elements that introduce uncertainty as to whether VMT reductions can consistently be achieved. First, the proposed Project and Alternative 5 are programmatic in nature. Specific development plans defining the size, configuration, and characteristics of potential future development projects could potentially result in VMT projections that differ from those reflected in the TAMDM modeling completed for this analysis, but site-specific information about future development projects is not available at this time. Because VMT performance is sensitive to these factors, it is not currently possible to conclusively determine VMT performance metrics and the effectiveness of project-level VMT reduction strategies for individual sites or for the Housing Element sites as a whole. Second, there is uncertainty about the ability for development projects on all project sites to achieve VMT reductions—particularly those projects on sites where it is infeasible to provide new or more frequent transit service and few alternative VMT reduction strategies are viable, at least until such time that VMT mitigation fee programs, banks, or exchanges can be established.

The program-level VMT impact described above does not preclude the finding of less-than-significant impacts for future development projects that achieve VMT levels that are below applicable thresholds of significance, including those that qualify for VMT screening as defined in OPR Technical Advisory or future VMT policies adopted by the City of Sausalito. It is likely that at least some of the sites identified in the proposed Project would meet one or more of the following VMT screening parameters:

- Small projects generating few daily trips based on ITE trip generation rates
- Local-serving retail and service uses
- Projects containing 100 percent deed-restricted affordable housing
- Projects within one-half mile of the Sausalito Ferry Terminal

Given the inability to assure that the residential VMT per capita and employment VMT per employee associated with the proposed project would be reduced below applicable VMT significance thresholds despite implementation of VMT reduction strategies, this impact would be ***significant and unavoidable***.

Impact 4.5-66 Implementation of Alternative 5 would not substantially increase hazards due to a geometric design feature or incompatible use. (See Impact 3.14-3 for Project impacts related to this topic)

While the designs of individual residential development projects under the Project and Alternative 5 are not known at this time, vehicular access is anticipated to generally take place via existing streets. Where new roads or access points are required, specific access schemes would be determined during project design, and would undergo review for

compliance with safety and design standards by the City of Sausalito as required. During such reviews, routine assessments include consideration of the potential need for traffic control or turn lane improvements to maintain safety, the potential for queueing conditions that could lead to safety concerns, and safety related to site accessibility for non-auto modes. Any new transportation facilities would be designed and constructed to local, regional, and federal standards, and as such, would not be expected to introduce any hazardous design features. Under Alternative 5, Site 14 has direct access to Spencer Street. Site 52 has direct access on three sides, to Litho Street, Bonita Street, and Bee Street.

The memorandum *Traffic Safety Bulletin 20-02-R1: Interim Local Development Intergovernmental Review Safety Review Practitioner's Guidance*, California Department of Transportation (Caltrans), 2020, provides guidance on how jurisdictions and practitioners may assess transportation safety topics associated with local development projects. The memorandum notes that, "This interim guidance is intended to apply to proposed land use projects and plans affecting the State Highway System (SHS). Specific effects may include but are not limited to adding new automobile, bicycle, or pedestrian trips to state roadways; modifying access to state roadways; or affecting the safety of connections to or travel on state roadways." The memorandum further explains that the guidance "does not establish thresholds of significance for determining safety impacts," and reiterates that "Automobile congestion or delay itself does not constitute a significant environmental impact (Public Resources Code, §21099(b)(2)), and traffic safety should not be used as a proxy for road capacity." As previously noted, future development proposals under the Project and Alternative 5 would be reviewed by the City of Sausalito, who, as part of standard procedures, may also refer larger projects located near Highway 101 to Caltrans for review. Site-specific safety assessments and required improvement measures would be established during such reviews, ensuring that project design features do not create safety hazards.

In summary, future development proposals of Opportunity Sites under the Project and Alternative 5 would be reviewed during standard entitlement processes for conformance with applicable design standards and regulations, ensuring that developments will not substantially increase transportation hazards. Impacts would be identical under Alternative 5 and the Project, and would be considered ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-67 Implementation of Alternative 5 would not result in inadequate emergency access. (See Impact 3.14-4 for Project impacts related to this topic)

Although the Project and Alternative 5 identify Opportunity Sites and Inventory Sites for residential development, they do not propose any site-specific site plans that could address emergency access. The City, however, has existing policies and practices in place that require emergency access to be analyzed during development project entitlement reviews, and this review would be carried out for individual development projects proposed under the Project and Alternative 5. Because Sausalito is predominantly built out, emergency access to potential housing sites would generally occur via existing roadways. Neither the Project nor Alternative 5 identify any new major roadways or other physical features that would result in inadequate emergency access.

The Sausalito General Plan includes several policies and programs addressing emergency access. Policy HS-2.4 requires the city to "provide and maintain adequate access for emergency vehicles and equipment, particularly firefighting equipment," and Program HS-2.4.2 requires private development to construct street frontage improvements to preserve safety where neighborhood compatibility concerns can be addressed. Program CP-2.5.1 calls for the city to develop goals for residential street parking including addressing circulation safety. With respect to construction activity, HS-2.4.1 calls for the city to maintain an encroachment permit process regulating construction vehicles and equipment that occupy the public right-of-way.

The City of Sausalito and responsible emergency service agencies including Southern Marin Fire Protection District will review individual development proposals under the Project and Alternative 5 to confirm that they conform to applicable regulations as governed by State laws, including the 2019 California Building Code, as well as the Southern Marin Fire Protection District Wildland Interface (WUI) ordinance (ratified by the City of Sausalito in March 2019), which outlines specific emergency access requirements for development in these areas. During such development reviews, responsible agencies will confirm that emergency vehicle access is adequate, including access from public streets to sites, internal circulation, and maneuverability at intersections. Proposed development projects that do not meet required standards and codes would not be permitted. Under Alternative 5, Site 14 has direct access to Spencer Street. Site 52 has direct access on three sides, to Litho Street, Bonita Street, and Bee Street. These access points are public streets accessible by emergency responders.

The added vehicular traffic associated with development of Opportunity Sites and Inventory Sites under the Project and Alternative 5 could affect emergency response vehicles during peak commute hours; however, responders are trained to manage congested conditions by employing tactics such as using sirens, making use of turn lanes and shoulders to bypass stopped traffic, and utilizing alternate routes to bypass congestion and minimize response times. California law also requires drivers to yield the right-of-way to emergency vehicles and

remain stopped until emergency vehicles pass. With respect to conditions that may occur during emergency evacuations, please see Section 3.8, Hazards and Hazardous Materials, and Impact 4.5-41.

The level of emergency access would be similar under Alternative 5 as under the Project. Considering that individual development projects proposed under the Project and Alternative 5 will be subject to established procedures for reviewing project-level emergency access needs and compliance with State and local law as part of the entitlement process, the project's impacts to emergency access would be considered ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-68 Implementation of Alternative 5, in conjunction with cumulative development, would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (a). (See Impact 3.14-5 for cumulative plus Project impacts related to this topic)

Cumulative development in the Bay Area was evaluated in Plan Bay Area 2050. The Plan Bay Area 2050 EIR notes that although VMT is expected to decline in the by Bay Area by 2050, there remains a gap between SB 375 targets and the targets needed to meet State GHG reduction goals linked to transportation. The ability to reduce regional VMT is tied to local jurisdictions and their ability to meet VMT targets in compliance with thresholds they set to meet CEQA Guidelines Section 15064(3)(b). Because regional entities, such as MTC and ABAG, cannot require local jurisdictions to reduce their local VMT, the cumulative impact of regional growth on VMT would be potentially significant for both Alternative 5 and the Project.

With respect to significant VMT impacts, significance is established by comparing Existing plus Alternative 5 conditions to VMT thresholds based on VMT per capita and VMT per employee performance metrics, as summarized above. As the OPR Technical Advisory states, "A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact." While not used in this analysis for the purposes of establishing impact significance, the cumulative 2040 plus Project VMT per capita and VMT per employee associated with the Project were projected using the TAMDM model. As shown in Table 3.14-2 in Section 3.14, Transportation and Circulation, the results indicate that the 2040 plus

Project residential VMT per capita would be 16.5 miles, which continues to be above the significance threshold of 12.6 miles. For the sites containing added nonresidential uses, the cumulative VMT per employee of 23.5 is also projected to remain above the significance threshold of 15.4 VMT per employee. Although there could be a small decrease in VMT overall, when considered at the citywide level, the decrease would not result in a measurable change to Sausalito's VMT per Capita. As a result, it can be concluded that Alternative 5's contribution to VMT impacts would be cumulatively considerable, and the cumulative impact would be ***potentially significant*** for Alternative 5 and the Project.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-68 Implement Mitigation Measure 3.14-2.

Level of Significance after Mitigation
Significant and Unavoidable

Implementation of this mitigation measure would reduce the VMT impacts associated with future development projects. Due to the uncertainty about the ability for development projects on all opportunity sites to achieve the required VMT reductions—particularly those projects on sites where it is infeasible to provide new or more frequent transit service and few alternative VMT reduction strategies are viable, this impact would be ***significant and unavoidable***.

Utilities and Service Systems

Information regarding the existing setting, regulatory setting, and thresholds of significance for Utilities and Service System impacts can be found on pages 3.15-1 through 3.15-18 in Section 3.15, Utilities and Service Systems, of the Draft EIR.

Impact 4.5-69	**Implementation of Alternative 5 could require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (See Impact 3.15-1 for Project impacts related to this topic)**

Water

Water supply and distribution in Sausalito is provided by the Marin Municipal Water District (MMWD). MMWD serves the majority of southern Marin County and serves all incorporated cities and towns in the County, except Novato. Approximately 75% of drinking water comes from rainwater captured on 21,500 acres of protected watershed in seven reservoirs on Mt. Tamalpais and in west Marin County. MMWD's service area is generally considered to be built-out, and very low population growth is expected within the area.[50]

The UWMP calculated the 2020 population per methodologies outlined for use in the Senate Bill (SB) X7-7 analysis and estimated the 2020 service area population to be 191,269.[51]

Population projections included in the 2020 UMWP account for housing allocations determined by the Association of Bay Area Governments (ABAG) 2023-2031 Final Regional Housing Needs Allocation (RHNA) Plan, which incorporates increases in population due to planned housing developments within the MMWD's service area.[52]

MMWD manages a distribution system of reservoirs, tanks, pumps, and pipelines to deliver water. MMWD has water rights to more surface water than it can access due to infrastructure constraints. For example, capital improvements are necessary to increase conveyance capacity from SCWA to the MMWD's full allocation; approximately 4,300 afy are unable to be conveyed due to infrastructure constraints.

MMWD's surface water reservoir system is also constrained. As described in the UWMP, under the water right for storage, 6,570 af of water from Nicasio Creek can be transferred from Nicasio Reservoir to Kent Lake to fill Kent Lake; this is in addition to any inflows from

[50] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 14.
[51] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 14.
[52] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 15.

Lagunitas Creek into Kent Lake. This would free up capacity in Nicasio Reservoir for additional storage up to the total of 29,000 af (22,430 af stored in Nicasio Reservoir plus 6,750 af transferred and stored in Kent Lake). However, new infrastructure would be required to transfer this supply since it cannot be conveyed via Lagunitas Creek.[53]

The proposed Project would increase the demand for potable water, and capital improvements would be necessary to provide right-sized infrastructure to obtain, transport, treat, and distribute potable water. These capital improvements may have a significant, adverse effect on the environment. Potential effects may include ground disturbing activities that impact sensitive species, air emissions from construction vehicles, energy demand from the facilities, or the inadvertent discovery of cultural resources. Alternative 5 would produce fewer residential units in the city and would add fewer new residents. Therefore, the demand for potable water would be less under Alternative 5 than under the Project.

Because the type and location of potential water system infrastructure improvements necessary to fully serve the Project or Alternative 5 is not known, this is a ***potentially significant impact***.

Wastewater

The City operates the wastewater collection system until the wastewater is delivered to SMCSD's collectors; SMCSD operates their collectors and the WWTP. SMCSD has capacity to accommodate wastewater treatment for the residential and mixed use development that would be facilitated by the Project. With a current dry weather flow of approximately 1.1 mgd, there is approximately 0.7 mgd capacity available of dry weather flow. SMCSD estimates a generation rate of 200 gallons per day per EDU (SMCSD Code Chapter 3.05.030.D.); the Project's 1,147 units would result in approximately 229,400 gallons per day, or 0.23 mgd of dry weather flows and would be within the total capacity of the WWTP. Development anticipated under Alternative 5 would result in 1,133 new residential units and a new population of 1,938 residents. As a result, Alternative 5 would have a wastewater treatment demand of approximately 226,600 gallons per day, or 0.23 mgd of dry weather flows. Because Alternative 5 would have a lower demand for wastewater treatment than under the Project, its flows would also be within the total capacity of the WWTP.

Future development under both the Project and Alternative 5 would be located within the City of Sausalito and near existing wastewater infrastructure. However, as individual future projects under the Project or Alternative 5 are proposed throughout the city, each individual project would require site specific evaluations for potential collection system improvements, including potential localized upsizing or provision of a local connection to the sewer mains. Any upsizing or connections would be made within the road right-of-way, and would not lead

[53] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 56. Table 6-2.

to impacts. The City complies with the statutory requirements listed in the regulatory section, and the General Plan ensures that the city will continue to comply with the state and federal regulatory requirements. Therefore, development facilitated under the Project and Alternative 5 would not require new or expanded wastewater treatment facilities. Alternative 5 would have a slightly lower impact on wastewater infrastructure than the Project. Impacts would be considered ***less than significant*** for both the Project and Alternative 5.

Storm Drain Capacity

Much of the storm drainage infrastructure within Sausalito is dated and beyond its reasonable life expectancy. New drainage infrastructure (including green drainage infrastructure) and maintaining existing culverts (through mitigating erosion and silt buildup) is key to reducing the risk of soil instability. This is an existing condition that is part of the environmental baseline, and not a condition that would result from implementation of the Project. Under existing conditions, as described under Impact 4.5-39, the city's stormwater system has sufficient capacity to accommodate additional stormwater runoff generated by future construction of projects proposed under the Project and Alternative 5. The City also conducts regular maintenance and upgrades to the system to ensure that it continues to function effectively.

Additionally, General Plan Program EQ-4.2.2 (Storm Drain System Improvements), directs the city to improve the existing storm drain system by considering funding improvements and maintenance in the capital improvement budget and by imposing storm drain requirements on private development as applications are received. Updates, improvements, replacements, or construction of new stormwater drainage infrastructure which are funded or result from new development elsewhere in the service area, would be required to comply with SBWCB and RWQCB construction orders for onsite stormwater management. These include the implementation of best management practices (BMPs) such as sediment and erosion control measures, stormwater detention and treatment systems, regular monitoring, and capacity requirements.

These storm drain improvements generally would not generally result in significant environmental impacts because they would be limited to maintenance, repair, and replacement of existing facilities and would not involve significant new disturbance or development. In addition, Program S-3.8.6 would require that new development under the Project and Alternative 5 not change drainage characteristics across property lines, further ensuring that storm drain work will not result in significant changes to the existing conditions.

The City currently complies with the statutory requirements listed in the regulatory section, and the General Plan ensures that the city will continue to comply with the state and federal regulatory requirements. Because Alternative 5 would have a similar amount of impervious

surface as the Project, impacts to storm drain capacity would be comparable. Therefore, impacts would be ***less than significant*** for both the Project and Alternative 5.

Electric Power, Natural Gas, and Telecommunications

The electrical power distribution system within the City of Sausalito is owned and operated by PG&E and home phone service and internet service is provided by ATT, ECG, and Pioneer Telephone. Future development facilitated under the Project and Alternative 5 would be located within the city and near existing electric power, natural gas, and telecommunications infrastructure. New growth anticipated by the Project would increase the city's population by approximately 1,962 residents, while growth anticipated by Alternative 5 would increase the city's population by 1,938 residents. The relatively small increase in population under both the Project and Alternative 5 would not be expected to substantially increase demand for electric power, natural gas, and telecommunications. An analysis of energy requirements and the potential for wasteful energy use is included in Section 3.5, Energy. New development under both the Project and Alternative 5 would be able to connect to existing infrastructure located within the city. Therefore, neither the Project nor Alternative 5would result in insufficient electric power, natural gas, and telecommunications infrastructure capacity, and no new or expanded electric power, natural gas, and telecommunications facilities would be needed.

The City's General Plan Policy HS-2.5 prioritizes the undergrounding of existing utilities and powerlines, which are at risk of hindering the movement of emergency vehicles. In general, undergrounding is assumed to occur within existing rights of way and would be subject to project-specific environmental review, if required, when an individual project is submitted for review under the Project or Alternative 5.

The City currently complies with the statutory requirements listed in the regulatory section, and the General Plan ensures that the city will continue to comply with the state and federal regulatory requirements. The demand for electricity, natural gas, and telecommunications would be similar under Alternative 5 as under the Project, and impacts would be ***less than significant.***

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
None Available

Minimized to the greatest extent feasible through General Plan policies and programs, compliance with statutory requirements, and utility plans, and through implementation of the municipal code that require individual projects to prove adequate utility capacity and infrastructure prior to approval. No additional feasible mitigation is available.

Level of Significance After Mitigation
Significant and Unavoidable

The only methods to completely avoid impacts associated with the construction and expansion of water, wastewater, and stormwater facilities would be to severely limit the development potential of the both the Project and Alternative 5 through decreasing densities or limiting development to locations with existing infrastructure that has excess capacity. These types of mitigation that could be considered for Alternative 5, and the Project, are not consistent with the objective of the proposed Amended Housing Element to accommodate Sausalito's housing needs, including the RHNA allocation in order to comply with Government Code Section 65863. As such, this impact would be ***significant and unavoidable*** for both the Project and Alternative 5

Impact 4.5-70	**Sufficient water supplies would be available to serve the implementation of Alternative 5 and reasonably foreseeable future development during normal, dry, and multiple dry years. (See Impact 3.15-2 for Project impacts related to this topic)**

Development and growth in the city would result in an increased demand for potable water. MMWD's service area is generally considered to be built-out, and very low population growth is expected within the area.[54]

The UWMP calculated the 2020 population per methodologies outlined for use in the Senate Bill (SB) X7-7 analysis and estimated the 2020 service area population to be 191,269.[55]

Population projections included in the 2020 UMWP account for housing allocations determined by the Association of Bay Area Governments (ABAG) 2023-2031 Final Regional Housing Needs Allocation (RHNA) Plan, which incorporates increases in population due to planned housing developments within the MMWD's service area.[56] Table 3.15-1 in Section 3.15, Utilities and Service Systems, shows the current and projected population increases in the MMWD service area.

Water use within the MMWD's service area is predominantly associated with residential use, with 54 percent of the water use between 2016 and 2020 from single family residential accounts and 12 percent from multi-family residential accounts. Commercial accounts

[54] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 14.
[55] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 14.
[56] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 15.

comprised 10 percent of total water use, landscape accounts comprised 5.5 percent, and institutional/governmental comprised 5.3 percent.[57]

Table 3.15-2 in Section 3.15, Utilities and Service Systems, shows the projected supply and demand totals for a normal year. Table 3.15-3 shows the projected supply and demand totals for a single dry year, and Table 3.15-4 shows the projected supply and demand totals for multiple dry year periods extending five years. The MMWD is projected to have sufficient supplies to meet projected demands in normal years, single dry years, and multiple dry years through 2045.[58]

The population growth associated with the RHNA for all jurisdictions served by MMWD was accounted for in the UWMP. The UWMP demonstrates that MMWD will have a robust water supply under normal year, single dry year, and multiple dry year conditions and is anticipated to have excess supply under all of these conditions and in all study years (2025, 2030, 2035, 2040, and 2045) as shown in Tables 3.15-3, 3.15-4, and 3.15-5.

The Project would facilitate development of 1,147 dwelling units, and a population of 1,962. As a result, the Project would have a water demand of 281.3 acre-feet per year.[59] Alternative 5 would facilitate development of 1,133 dwelling units, and a population of 1,938. As a result, Alternative 5 would have a water demand of 277.8 acre-feet per year,[60] which would be less than the Project. The lowest excess supply of 11,541 acre feet per year is projected in 2045 under a single dry year condition. This excess supply is more than adequate to serve the 281.3 acre feet of year demand for water that would occur with implementation of the Project, and therefore, Alternative 5. Therefore, MMWD has the capacity to accommodate the water supply demands for both the Project and Alternative 5. Because the water demand under Alternative 5 would be less than that under the Project, Alternative 5 would have less impact than the Project.

If MMWD should experience a shortage of supply during a drought, it will activate its current Water Shortage Contingency Plan to reduce water consumption. Any direction by MMWD for reduced consumption would be applicable to all MMWD customers, not only the increased demand resulting from the Amended Housing Element.

In addition, with SB X7-7 and the State and county water conservation ordinances in place, each jurisdiction within the MMWD service area is required to conserve its water use through

[57] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 26.

[58] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 91.

[59] 128 gallons per capita per day x 1,962 persons = 293,376 gallons per day
293,376 gallons per day x 365 days = 91,664,640 gallons per year
91,664,640 gallons per year / 325,900 gallons per acre-foot = 281.3 acre feet per year

[60] 128 gallons per capita per day x 1,938 persons = 248,064 gallons per day
248,064 gallons per day x 365 days = 90,543,400 gallons per year
90,543,400 gallons per year / 325,900 gallons per acre-foot = 277.8 acre feet per year

establishing water efficiency measures. As required by the City's General Plan, the City of Sausalito will continue to coordinate with MMWD regarding water conservation efforts, demand management measures promoted by MMWD, compliance with the MWELO for new landscaping, compliance with current CalGreen measures and Sausalito CAP measures promoting efficient indoor and outdoor water use. These measures would serve to reduce water use and demand overall and especially during drought years.

The City's General Plan requires development to demonstrate adequacy of facilities and water supplies through Policy S-3.8 and Programs S-3.8.2 and S-3.8.4. Additionally, Programs EQ 4.4.2 and 4.4.5 ensure continued collaboration between the City and MMWD regarding water conservation. Therefore, impacts to water supply from both the Project and Alternative 5 would be ***less than significant***.

Level of Significance before Mitigation
Less Than Significant

Mitigation Measures
None Required

Level of Significance After Mitigation
Less than Significant

Impact 4.5-71 The wastewater treatment provider would have adequate capacity to serve the demand generated by Alternative 5 in addition to the provider's existing commitments. (See Impact 3.15-3 for Project impacts related to this topic)

The San Francisco Bay RWQCB established wastewater treatment requirements for the SMCSD WWTP in NPDES Permit (Order No. R2-2023-002).[61] The Order sets out a framework for compliance and enforcement applicable to operation of the WWTP and its effluent, as well as those contributing influent to the SMCSD WWTP. This NPDES Order currently allows peak wet weather discharges of up to 6 mgd.

The SMCSD SSMP included a capacity assessment to determine the adequacy of the collection system to handle current and future wastewater flows. The Plan also included a system evaluation, based on results of two sewer system capacity studies, as well as an extensive wet weather flow monitoring program as required under the administrative compliance order by the U.S. EPA in 2008, and a Capacity Assessment and Capacity Assurance Plan as part of the third submittal of its Sewer Spill Reduction Action Plan, required by the EPA order.

[61] United States Environmental Protection Agency (EPA) and San Francisco Bay Regional Water Quality Control Board (RWQCB). 2023. Sausalito – Marin City Sanitary District (Order R2-2023-0022, NPDES No. CA 0038067) Wastewater Treatment Plant Inspection. November 8.

The hydraulic analysis evaluated the SMCSD capacity based on peak wet weather flow conditions, which demonstrate the maximum potential wastewater flows that could impact the system. The hydraulic analysis identified several deficiencies including inadequate gravity interceptor systems upstream of the Locust Street Pump Station and capacity limitations leading to potential overflows. As stated in the SSMP, all of the deficiencies will be addressed with CIP projects as well as planned improvements to the pump stations and upgrades to the WWTP. In addition, both Sausalito and Tamalpais Community Services District are also undertaking sewer rehabilitation work, which will contribute to reductions in deficiencies in the SMCSD system. Furthermore, the SMCSD continues to update its sewer system rate plan to fund capacity enhancements.

According to the Final Sanitary Sewer Strategic Plan 2024-2029, the Wet Weather Flow Upgrade Project has been completed and addresses new discharge regulations, manages peak wet weather flows, and improves treatment plant performance and reliability. Secondary treatment capacity was increased from 6 mgd to 9 mgd to significantly reduce blending events and tertiary treatment capacity was increased from 1 mgd to 6 mgd. In addition, a 600,000-gallon storage basin was constructed to trim flow during peak storm events.[62]

The General Plan includes policies and programs to support and enhance efforts to reduce wastewater generation flows in the Planning Area, which would apply equally to the Project and Alternative 5. For example, Policy S-3.8 would allow construction to proceed for only those projects that demonstrate the availability of adequate potable water, sewer, septic leach fields, and storm drainage. Program S-3.8.3 requires written documentation from the Sausalito-Marin City Sanitation District that there is available and adequate sewer capacity prior to project approval. Program S-3.8.8 requires the city to continue to upgrade the city's sewer system in accordance with prioritization Sausalito's Capital Improvement and Strategic Plans.

The Sausalito Municipal Code also contains rules and regulations related to wastewater. Chapter 18.12 establishes standards for connecting to the public sanitary sewer system. Section 18.12.060 includes regulations regarding the process for connecting to the public sanitary sewer system. The requirements include prohibitions on septic tanks, cesspools, or other individual sewage disposal systems, and may also require the installation, by a property owner, of an extension of a sewer main within a public utility easement or city street right-of-way to the point of the service lateral connection as determined by the City Engineer to address any leaks and/or ensure sufficient capacity.

According to the SMCSD's 2019 Sewer System Management Plan, the District's collection system serves approximately 2,000 connections in Marin City and the unincorporated areas, services a population of approximately 18,000 throughout its service area (including the City of Sausalito's

[62] Sausalito-Marin City Sanitary District, Strategic Plan 2024-2029, adopted June 2024. Page 7

population that utilizes the District interceptor system), and includes approximately 7.4 miles of gravity sewer pipes, 3.7 miles of force main, and 7 pump stations. An additional 4 pump stations are owned by the City but operated and maintained by the District. The City's sewer system is shown on Figure 3.15-2 in Section 3.15, Utilities and Service Systems.

The City of Sausalito has been in the process of rehabilitating its aging sanitary sewer infrastructure. The 2019 Sewer Rate Study identified roughly $8.6 million in planned capital improvements through 2024, which consists primarily of pipeline replacements, and represents an aggressive replacement schedule.[63]

The wastewater transported through the City's collection system is discharged into the SMCSD conveyance system for final transport, treatment, and disposal through a deep-water discharge to the San Francisco Bay. The City is responsible for the gravity sewer mains; SMCSD is responsible for the operation and maintenance of the three City lift stations and force mains.

The SMCSD WWTP provides secondary treatment of wastewater, which is subsequently discharged into San Francisco Bay. It is designed to process an average daily dry weather flow (ADWF) of 1.8 million gallons per day (mgd) of wastewater and a maximum daily wet weather flow of 12.0 mgd, with the capability to treat up to 9.0 mgd of full secondary treatment and firm tertiary treatment capacity of 3.0 mgd, with a potential of up to 6.0 mgd tertiary treatment during wet weather flow.[64] The WWTP's maximum capacity had been limited to approximately 6.0 mgd by fixed-film reactor treatment capacity and recent upgrades in 2021 to the WWTP addressed these limitations and increased capacity to 12.0 mgd as described. The project included addition of a headworks with bar screening and grit removal, construction of a supplemental primary clarifier, upgraded media and new pumps to increase the treatment capacity of fixed-film reactors, replacement of sand filters with rotating disk filters, and construction of 600,000 gallons of flow equalization storage. The updated treatment process includes bar screening, grit removal, primary clarification, biofiltration using fixed film reactors, secondary clarification, filtration using rotating disk filters, chlorine disinfection, and sodium bisulfite dechlorination.[65]

SMCSD can accommodate wastewater treatment generated by additional development facilitated by the Amended Housing Element and new development would be near existing wastewater infrastructure. As individual future projects are proposed throughout the city and the district would be required to evaluate each site for potential collection system improvements, including potential upsizing to accommodate development.

[63] City of Sausalito, 2019. City of Sausalito Sewer Rate Study. June. Page 5.
[64] Sausalito-Marin City Sanitary District Strategic Plan 2022-2027, May 3, 2022.
[65] United States Environmental Protection Agency (EPA) and San Francisco Bay Regional Water Quality Control Board (RWQCB). 2023. Sausalito – Marin City Sanitary District (Order R2-2023-0022, NPDES No. CA 0038067) Wastewater Treatment Plant Inspection. November 8. Page F-4.

With a current dry weather flow of approximately 1.1 mgd, there is approximately 0.7 mgd capacity available of dry weather flow. SMCSD estimates a generation rate of 200 gallons per day per EDU (SMCSD Code Chapter 3.05.030.D.); the Project's 1,147 units would result in approximately 229,400 gallons per day, or 0.23 mgd of dry weather flows and would be within the total capacity of the WWTP. Alternative 5 anticipates development of up to 1,133 dwelling units, resulting in an increased population of 1,938 residents. Alternative 5 would generate 226,660 gallons per day, or 0.23 mgd of dry weather flows, and would be within the total capacity of the WWTP. Therefore, while a need to improve the City's wastewater conveyance infrastructure remains due to the aging infrastructure within the City, the WWTP would have the capacity to serve development anticipated by the Project and Alternative 5.

In conclusion, while development facilitated by the Project and Alternative 5 would result in an incremental increase in the demand for wastewater collection and treatment, the SMCSD WWTP has sufficient capacity to support new infill development within the Planning Area for both the Project and Alternative 5. The demand for wastewater treatment would be less under Alternative 5 than under the Project. Furthermore, the CIP contains projects and improvements to the SMCSD system that would ensure sufficient capacity for future development. In addition, future projects would be required to comply with requirements of the City's General Plan and Municipal Code to reduce wastewater generation flows. Lastly, the City will continue to coordinate with the SMCSD to ensure that adequate wastewater collection and treatment facilities are provided to serve development in the city. Therefore, impacts related to wastewater collection and treatment would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance After Mitigation
Less than Significant

Impact 4.5-72	**Implementation of Alternative 5 would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. (See Impact 3.15-4 for Project impacts related to this topic)**

As described in Section 2.0, Project Description, the Project is expected to accommodate up to 1,147 total housing units. As such, development and growth identified in the city under the Housing Element would result in an increased generation of solid waste.

As detailed in the Regulatory Setting section, under the Marin County IWMP, each jurisdiction in the County is required to divert 50 percent of its solid waste from landfills. The City of

Sausalito is a member of the Marin County Hazardous and Solid Waste Joint Powers Authority (Zero Waste Marin), which reports the number of solid waste programs and annual per capita disposal rates to CalRecycle. In 2021, the disposal rate was 5.2 pounds/person/day for residents and 11.8 pounds/person/day per employee.[66]

Table 4-12 summarizes the additional solid waste that could be generated from development facilitated by both the Project and Alternative 5.

TABLE 4-12 SOLID WASTE GENERATION ESTIMATE

SCENARIO	CATEGORY	WASTE GENERATION RATE	NET NEW SERVICE POPULATION	WASTE GENERATION INCREASE	
				DAILY	ANNUALLY
Proposed Project	Resident	5.2 pounds/day	1,962 residents	10,202 pounds	1,862 tons
Alternative 5	Resident	5.2 pounds/day	1,938 residents	10,078 pounds	1,839 tons

Notes:

1 ton=2,000 pounds
1 cubic yard=1.4 tons

1.75 PPH per DOF 2022

Source: FCS, 2020; DOF 2022

Assuming disposal rates established by CalRecycle remains constant through, new population growth facilitated by the Project and Alternative 5 would result in an increase of approximately 10,202 additional pounds (5.1 tons) per day of additional solid waste or 1,862 additional tons of solid waste per year. Alternative 5 would generate 10,078 pounds per day or 1,839 tons of solid waste per year. Because Alternative 5 would generate less solid waste than the Project, Alternative 5 would have less severe impacts on solid waste facilities. All future development anticipated under the Project and Alternative 5 would be required to be in compliance with General Plan Policy S-2.1 Waste Reduction, Reuse, Recycling, which would result in a steady increase in the rate of diversion of solid waste from landfills to recycling and composting centers to achieve a 94 percent diversion rate by the year 2025.

As previously stated, the City of Sausalito is served by Bay Cities Refuse, which transports the city's solid waste to the Golden Bear Waste Recycling Center located in Richmond. The facility had a permitted capacity to accept 1,400 tons of material daily. [67] The city's additional solid

[66] CalRecycle, 2018. Jurisdiction Diversion/Disposal Rate Detail. Marin County Hazardous and Solid Waste Management Authority. Available: https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionDetail?year=2018&jurisdictionID=110. Accessed August 30, 2024.

[67] CalRecycle. SWIS Facility/Site Activity Details. Golden Bear Waste Recycling Center (07-AA-0056). Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4426?siteID=247. Accessed: August 30, 2024.

waste of 5.1 tons per day from the additional development to accommodate Project growth would not exceed the existing daily capacity of the Golden Bear Waste Recycling Center. Alternative 5 would produce 5.0 tons per day of solid waste, and would have slightly less of an impact on the existing daily capacity of the Golden Bear Waste Recycling Center. The city's annual solid waste generation under the General Plan is well within the permitted capacity of the Golden Bear Waste Recycling Center. The recyclable materials generated within the City would be transferred to the West County Resource Recovery facility in Richmond.

The remainder of the solid waste would be transferred to the Keller Canyon Landfill in Pittsburg. Another landfill in the region that has capacity is the Potrero Hills Landfill in Suisun City. These two landfills combined have approximately 77.2 million cubic yards of capacity remaining. Accordingly, adequate landfill capacity exists to serve the development anticipated to occur as a result of the Project and Alternative 5.

While it is anticipated that there is adequate permitted landfill capacity to accommodate future growth, all future development facilitated by the Project and Alternative 5 would be required to be consistent with the policies and programs identified in the City's General Plan. Specifically, the Sausalito General Plan includes programs and policies to reduce impacts on solid waste services. Policy S-2.1 requires the city to reduce the amount of solid waste generated in Sausalito in accordance with State law and Zero Waste Marin goals. Program S-2.1.1 requires the city to coordinate local recycling efforts and publicity efforts with those of the County Solid Waste Management Plan. Program S-2.1.2 requires the city to continue to implement the existing residential recycling program and establish a commercial recycling program in coordination with the Chamber of Commerce and local businesses. Program S-2.1.12 requires the city to adopt a Zero Waste Resolution with the goal of diverting 94 percent of waste from landfills by 2025, and Program S-2.1.13 requires the city to implement actions to reduce waste both citywide and in government operations as described in the City's CAP. Policy S-2.2 requires the city to implement education and social media programs to change Sausalito's waste-related behavior, emphasizing composting and recycling.

Zero Waste Marin has developed programs for residential and businesses that are designed to meet the zero waste goal. For example, residential programs include a recycling guide, online suggestions for recycling various wastes, and required composting for multifamily complexes generating four cubic yards of trash per week. Business programs include 65 percent diversion of construction and demolition waste, and compliance with State recycling and composting statutes. As mentioned prior, in 2018, the disposal rate of the Marin County Hazardous and Solid Waste Management Authority (which Sausalito is a member of) was 5.1 pounds/person/day for residents, with a population disposal target of 7.6, and 11.8 pounds/person/day per employee, with an employment disposal target of 17.3.[68] This indicates that the City is meeting diversion rate requirements, pursuant to SB 1383.

[68] CalRecycle, 2018. Jurisdiction Diversion/Disposal Rate Detail. Marin County Hazardous and Solid Waste Management Authority. Available:

The Sausalito Municipal Code contains rules and regulations related to solid waste. Chapters 12.24, 11.40, and 11.30 set policies on collection and removal of solid waste and prohibits the use of single use plastic bags and packaging materials. The city would be required to continue to comply with all federal, State, and local statutes and regulations related to solid waste.

While development facilitated by the Project and Alternative 5 would result in increased generation of solid waste in the Planning Area, future projects under both the Project and Alternative 5 would be required to comply with the requirements of the General Plan and Sausalito Municipal Code to divert solid waste from the local landfills pursuant to SB 1383, including Program S-2.1.12 requiring the adoption of a Zero Waste Resolution with the goal of diverting 94 percent of waste from landfills by 2025, and Program S-2.1.13, which requires the city to implement actions to reduce waste both citywide and in government operations as described in the City's CAP. In addition, the city will be required to comply with existing and new federal, State, and local statutes and regulations related to solid waste. Alternative 5 would generate less solid waste than development under the Project, and impacts would therefore be less. Impacts related to solid waste would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance After Mitigation
Less than Significant

Impact 4.5-73 Implementation of Alternative 5 would comply with federal, State, and local statutes and regulations related to solid waste. (See Impact 3.15-5 for Project impacts related to this topic)

Development and growth in the city under both the Project and Alternative 5 would result in an increased generation of solid waste. As described in Impact 4.5-58, future development in the City of Sausalito would not result in a significant impact to solid waste generation such that the landfills in the region would not have adequate capacity to serve future housing needs development. The City's General Plan contains policies to ensure compliance with the goals of waste reduction and implement recycling programs, which would apply equally to the Project and Alternative 5. In addition, the Sausalito Municipal Code contains measures that aim to reduce solid waste generation, such as prohibiting single-use plastic bags and packaging materials. Furthermore, Zero Waste Marin has developed programs for

https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionDetail?year=2018&jurisdictionID=110. Accessed August 30, 2024.

residential and businesses that are designed to meet the zero waste goal consistent with State regulations. Program S-2.1.12 requires the city to adopt a Zero Waste Resolution with the goal of diverting 94 percent of waste from landfills by 2025, and Program S-2.1.13 requires the city to implement actions to reduce waste both citywide and in government operations as described in the City's CAP.

While development facilitated by the Project and Alternative 5 would result in an increased generation of solid waste in the Planning Area, future projects would be required to comply with requirements of the Sausalito General Plan and Municipal Code to divert solid waste from the local landfills. In addition, the city will be required to comply with existing and new federal, State, and local statutes and regulations related to solid waste. Alternative 5 would generate less solid waste than development under the Project, and impacts would therefore be less. Impacts related to solid waste would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance After Mitigation
Less than Significant

Impact 4.5-74	**Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impacts with respect to water infrastructure, but would not result in significant cumulative impacts with respect to water supply, wastewater, solid waste, and storm drain services or facilities.**

This analysis evaluates whether the impacts of Alternative 5, together with the impacts of cumulative development, would result in a cumulatively significant impact with respect to water supply, wastewater, solid waste, or storm drain facilities. This analysis then considers whether incremental contribution of impacts associated with the implementation of Alternative 5 would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of significance.

Water Supply

Supplies

The geographic context for the analysis of cumulative impacts related to water supply includes the MMWD service area. As demonstrated in the UWMP, MMWD has enough water

supply in 2045 to accommodate all of the RHNA plans within the District. The MMWD is projected to have sufficient supplies to meet projected demands in normal years, single dry years, and multiple dry years through 2045.[69] Overall, cumulative water demands would not exceed planned levels of supply and the cumulative impact on water supply would be ***less than significant***, as it would be for the Project.

Infrastructure

As cumulative growth within the MMWD service area increases, additional water supplies will need to be conveyed to users. While MMWD manages a distribution system of reservoirs, tanks, pumps, and pipelines to deliver water, MMWD has water rights to more surface water than it can access due to infrastructure constraints. Additional infrastructure will be needed to transport, treat, and distribute potable water in the cumulative scenario. These capital improvements may have a significant, adverse effect on the environment. Potential effects may include ground disturbing activities that impact sensitive species, air emissions from construction vehicles, energy demand from the facilities, or the inadvertent discovery of cultural resources. Therefore, the cumulative impact on water supply infrastructure is potentially significant.

Development facilitated by Alternative 5 would tie into the existing MMWD facilities for water supply. However, additional connections and main hookups may be necessary, which could result in a potentially significant effect on the environment. Potential effects may include ground disturbing activities that impact sensitive species, air emissions from construction vehicles, energy demand from the facilities, or the inadvertent discovery of cultural resources.

Because the type and location of potential water system infrastructure improvements necessary to fully serve the proposed Project is not known, Alternative 5 would have a cumulatively considerable contribution to the demand for water infrastructure, the cumulative impact would be ***potentially significant***, as it would be under the Project.

Wastewater

The geographic context for the analysis of cumulative impacts related to wastewater conveyance and treatment includes the SMCSD. All cumulative projects would be required to comply with city/County ordinances and the City's General Plan policies, as well as other regulations related to wastewater collection and treatment. As described under Impact 4.5-71, the SMCSD WWTP would have sufficient wastewater conveyance and treatment capacity. The WWTP is currently allowed peak wet weather discharges of up to 6 mgd. Planned CIP programs as described in the SSMP would ensure the SMCSD would contain sufficient

[69] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 91.

capacity to convey and treat wastewater within its service area. For these reasons, cumulative impacts to waste water would be ***less than significant***, as it would be for the Project.

Solid Waste

Cumulative development within Sausalito and other jurisdictions served by local solid waste facilities would contribute to an incremental increase in solid waste delivered to the Golden Bear Waste Recycling Center, the West Contra Costa County Sanitary Landfill Organic Materials Processing facility, the Keller Canyon Landfill, the Potrero Hills Landfill, and other landfills and recycling centers in the region. These landfills have millions of cubic yards of capacity remaining, with closure dates as far out as 2050. Therefore, the cumulative impact on solid waste would be ***less than significant*** for both Alternative 5 and the Project.

Storm Drainage

The geographic context for analysis of cumulative impacts to storm drain facilities includes the incorporated and unincorporated lands surrounding the Sausalito Planning Area. Cumulative development contributes to an incremental increase in impervious surfaces that could increase stormwater runoff and impact existing storm drain facilities. All cumulative projects would be required to comply with City/County ordinances and General Plan policies, as well as other regulations that minimize stormwater runoff, such as the Clean Water Act. For these reasons, cumulative impacts to storm drainage would be ***less than significant*** for both Alternative 5 and the Project.

Electric Power, Natural Gas, and Telecommunications

As development in the Bay Area grows, the cumulative demand for electricity, natural gas, and telecommunication services and infrastructure would increase. Dry utility providers continually upgrade and expand service capacity and physical infrastructure to respond to evolving and improving technology, increased demand, improved reliability, and the availability of expanded supplies. Cumulative development would not outpace the provision of dry utility services, and the cumulative impact on dry utilities would be ***less than significant*** for both Alternative 5 and the Project.

Level of Significance before Mitigation
Potentially Significant for Water Infrastructure

Less Than Significant for Water Supplies, Wastewater, Solid Waste, Storm Drainage, Electric Power, Natural Gas, and Telecommunications

Mitigation Measures

The only methods to completely avoid impacts associated with the construction and expansion of water facilities would be to severely limit the development potential of Alternative 5, including reducing densities and allowed units and limiting development to locations with existing infrastructure that has excess capacity. These types of mitigation are not consistent with the objective of the Project to accommodate Sausalito's housing needs, including the RHNA allocation in order to comply with Government Code Section 65863. As such, this impact would be ***significant and unavoidable*** for both Alternative 5 and the Project.

Level of Significance After Mitigation

Significant and Unavoidable for Water Infrastructure

Less Than Significant for Water Supplies, Wastewater, Solid Waste, Storm Drainage, Electric Power, Natural Gas, and Telecommunications

Wildfire

Information regarding the existing setting, regulatory setting, and thresholds of significance for Wildfire impacts can be found on pages 3.16-1 through 3.16-23 in Section 3.16, Wildfire, of the Draft EIR.

Impact 4.5-75	**Implementation of Alternative 5 could result in the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. (See Impact 3.16-1 for Project impacts related to this topic)**

Development facilitated by the Project and Alternative 5 would be within the existing city limits and would generally consist of infill development within already established neighborhoods, developed areas, and areas currently planned for developed uses. Fire Hazard Severity Zone Maps for State Responsibility Area lands and Very High Fire Hazard Severity Zone Maps for Local Responsibility Area lands indicated that no Very High Fire Hazard Severity Zones are included within the city as delineated by CAL FIRE. However, as described in Section 3.16, Wildfire, there are locally designated high fire threats areas located throughout the Planning Area that are delineated by the MFPD. Fire hazard areas designated by the MFPD within the WUI that are at risk of wildfire are shown on Figure 3.16-2.

Development and growth accommodated by the Project and Alternative 5 could result in an incremental increase in the number of people and structures exposed to wildland fire hazards within the WUI and locally designated wildfire hazard areas. Additional future development accommodated by the Project and Alternative 5 could expose people or structures, either directly or indirectly, to a risk of loss, injury, or death involving wildland fires. Both the Project and Alternative 5 would accommodate residential and mixed use development in and near areas identified as WUI Very High and WUI High fire hazard areas. However, while the Project and Alternative 5 would accommodate growth in areas with potential for wildland fires, the urban land use designations in the city are not being expanded and the Project and Alternative 5 would accommodate increased residential and mixed use development intensities areas that are designated for urban developments.

Under Alternative 5, but not under the Project, Opportunity Site 14 is within a High Wildland/Urban Interface (WUI) area. Opportunity Site 52 is in an Urbanized Unzoned area and is not designated as being in a high fire zone. Most of Site 84 is within a Very High WUI area; reducing the number of units on that site under Alternative 5 would reduce the amount of risk placed on residents.

As described in the Existing Setting and Regulatory Setting of Section 3.16, Wildfire, many agencies and programs support fire hazard reductions within the Planning Area including programs aimed at wildfire prevention, suppression, emergency response and evacuation and coordination. The State of California, GGNRA, County of Marin, SMFD, and City of Sausalito have plans, policies, programs, and ordinances in place to reduce the risks

associated with wildland fires as described previously in the regulatory setting and summarized below.

Future development applications under both the Project and Alternative 5 will be evaluated by City departments for consistency with adopted standards including consistency with the CBC, which includes the Fire Code, and the City's Municipal Code and General Plan at the time development applications are proposed. All development within the city including ministerial projects and discretionary projects would be required to be consistent with plans, policies, programs, and ordinances in place that aim to reduce wildfire risk including the CBC requirements and development standards for areas within fire hazard areas and within the WUI. Future development applications will be evaluated by City departments for consistency with development standards including consistency with the Municipal Code and General Plan at the time they are proposed. In addition, future discretionary projects facilitated by both the Project and Alternative 5 will be evaluated for project-specific impacts through the development review process at the time they are proposed.

Marin County's MJHMP dedicates a subsection to wildfire and post-fire debris flow. The MJHMP was revised in 2023 to reflect progress in local mitigation efforts. Mitigation projects were selected for each hazard and for the City of Sausalito based off the hazard risk assessment. The projects are supported by the mitigation goals and objectives, and are ranked using the following criteria: approximate cost, timeframe of completion, whether the project requires City Council regulatory action, and an assumption as to whether or not the project would be subject to CEQA or NEPA requirements. Funding sources are identified for all projects, and all projects consider new, future, and existing development. The City of Sausalito maintains project worksheets with detailed descriptions of each project. A summary of each project is found in the MJHMP City of Sausalito Community Profile. [70]

The EOP assists in inter-agency coordination in emergency operations. The city also participates in programs to reduce wildfire risks that are offered by SMFD, FIRESafe Marin, and CAL FIRE.

The Marin County CWPP, developed through a collaborative process involving Fire Safe Marin, Marin County fire agencies, county officials, county, state, and federal land management agencies, and community members, provides fire agencies, land managers, and other stakeholders in Marin County with guidance and strategies to reduce fire hazard and the risk of catastrophic wildfires in the WUI, while promoting the protection and enhancement of the county's economic assets and ecological resources.

[70] County of Marin, 2023. Marin County Emergency Portal, Marin County Multi-Jurisdictional Hazard Mitigation Plan, City of Sausalito Community Profile. Available: https://emergency.marincounty.gov/pages/mitigation. Accessed: November 25, 2024.

The 2020 SMFD WUI Wildfire Hazard and Risk Assessment includes programs and goals for Sausalito to reduce wildfire hazards, including educating high risk areas on wildfire fuel mitigation and improving wildfire and disaster evacuation alerts.

Furthermore, the SMFD conducts evacuation exercises annually to prepare for emergency situations. Evacuations in the Sausalito Planning Area are an emergency support function that local law enforcement organizes and coordinates with the SMFD.[71] Development facilitated by implementing the Project or Alternative 5 would all would be located within the existing city limits, and would be substantially similar to the development types and developable areas as what was already planned for and would not directly alter or change existing emergency evacuation routes. However, modeling demonstrates that evacuation routes would operate over capacity in the 2040 Baseline Scenario, resulting in potential evacuation delays during an emergency.

The SMFD Ordinance contains rules and regulations for existing development as well as future development, within WUI Fire Areas to reduce the risks from wildland fires, which would apply equally to the Project and Alternative 5. For example, buildings and structures located within the WUI Fire Areas shall maintain the required hazardous vegetation and fuel management as well as defensible space as outlined in Government Code Sections 51175-51189 and local standards of the City of Sausalito. In addition, any person who owns, leases, controls, or maintains any building or structure, vacant lands, open space, and/or lands within specific WUI areas of the jurisdiction of the SMFD, shall comply with the fire hazard reduction items identified in the California Fire Code Section 4907.2, including but not limited to, cutting and removing all fire prone vegetation within 30 feet of structures, removing accumulated dead vegetation on the property, cutting/removing tree limbs that overhand wood decks and roofs, cleaning leaves and needles from rooftops and gutters, and clearing flammable brush and vegetative growth from fire access roads or driveways.

The Sausalito General Plan contains policies and programs that reduce risks from wildland fires before development occurs, which would apply equally to the Project and Alternative 5. Specifically, Policy HS-1.3 contains several programs to minimize fire risk to property and people, including maintaining building codes and construction requirements related to fire hazards. Additionally, Objective HS-2 (Engage in Disaster Planning) includes policies and specific programs with requirements and enforcement measures to reduce fire risk. Examples include Policy HS-2.1, which requires publication of a disaster plan to identify disaster mitigation and evacuation; Policy HS-2.4, provides and maintain adequate access for emergency vehicles and equipment, particularly fire-fighting equipment; Policy HS-2.5 and related programs that prioritize undergrounding of overhead utilities that could hinder the movement of emergency vehicles; and Policy HS-2.6, which requires management of fuel loads in open space areas and maintenance of defensible space around residences.

[71] City of Sausalito, 2020. Revised General Plan EIR. October 27, 2020. SCH # 2019100322.

As the City receives individual development applications for subsequent development projects under the Project or Alternative 5, those applications will be reviewed by the City of Sausalito for compliance with the policies and programs of the General Plan and Municipal Code to reduce the exposure of people or structures, either directly or indirectly, to a risk of loss, injury, or death involving wildland fires. In particular, all development would be subject to the Building and Fire codes to address fire hazard conditions unique to Sausalito (Program HS-1.3.1); the requirement that all roofing material used in new construction or substantial remodel be fire rated "A" (Program HS-1.3.4); and private disaster evacuation planning for new development in case of a wildfire (Policy HS-2.1). In addition, projects would be reviewed for consistency with the City's Municipal Code. Under Section 8.42.020 of the Municipal Code, in order to ensure so far as possible the safety of residents of the city from large and destructive fires, the Building Official shall not issue any building permits for any new structures in areas meeting the criteria described in Section 8.42.010 without the approval of the Fire Chief of the City of Sausalito.

In conclusion, development accommodated under the Project and Alternative 5 is generally focused in infill areas, within the current city limits, and in developed, urbanized areas of the city. However, development could result in an incremental increase in exposure of people and structures to wildland fires and associated hazards, including increased evacuation times, within the Planning Area as all future development (including growth accommodated by the Project and Alternative 5) would add more people and structures within the city. Further, an evacuation during a project's construction has the potential to expose more people to wildfire. Although construction traffic management plans would be in place during a project's construction which could reroute traffic in a disaster, construction on or adjacent to a public roadway could slow evacuation times and expose people to higher risk.

No areas or development would be included within or adjacent to VHFSZs as designated by CAL FIRE. However, development allowed and facilitated by the Project and Alternative 5, would place more people and structures in areas of the city that have been locally designated as WUI Very High and WUI High fire hazard areas. Opportunity Site 14 is within a High WUI area and new residents live there under Alternative 5. Most of Site 84 is within a Very High WUI area, and reducing the number of units on that site under Alternative 5 would reduce the amount of risk placed on new residents.

Future development under both the Project and Alternative 5 would be required to comply with the provisions of federal, State, and local requirements related to wildland fire hazards, including State fire safety regulations associated with wildland-urban interfaces, fire-safe building standards, and defensible space requirements.

As described previously, future projects under the Project and Alternative 5 would be required to comply with fire protection measures in the SMFD Ordinance, policies and programs within the General Plan, and the Sausalito Municipal Code. Further, continued implementation of the CWPP, Marin Operational Area Emergency Operations Plan, GGNRA

Fire Management Plan, and recommendations identified in the 2020 SMFD WUI Wildfire Hazard and Risk Assessment, will assist in protecting life and property in the event of a wildfire, and as identified above reduces potential impacts related to exposure to wildland fires and associated hazards. In conclusion, development accommodated under the Project and Alternative 5 is generally focused in infill areas, within the currently city limits, and in already developed areas of the city; however, development could result in an increase in exposure of people and structures to wildland fires and associated hazards within the Planning Area as future development accommodated by the Project and Alternative 5 would add more people and structures within the city. Potential impacts under Alternative 5 would be slightly less than under the Project because Alternative 5 would accommodate fewer housing units and fewer new residents. Development allowed and facilitated by the Project and Alternative 5 would place more people and structures in areas of the city that have been designated as WUI Very High and High fire hazard areas. Therefore, impacts related to exposure of people and structures to wildland fires and associated hazards, either directly or indirectly, would be considered ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-75 Implement Mitigation Measure 3.16-1a, b, and c.

> **MM 3.16-1a:** To reduce fire risk, all residential and mixed-use projects on Inventory Sites and Opportunity Sites identified in the Housing Element that are located in the WUI Very High and WUI High fire hazard areas or fire hazard severity zones as designated by the Sausalito Marin City Fire Protection District, City of Sausalito, or Marin County Fire Department shall comply with the State fire safety regulations associated with wildland-urban interfaces, fire-safe building standards, access and egress standards, and defensible space, including all standards for development in Very High Fire Hazard Severity Zones regardless of whether the project is located within a CAL FIRE-designated Very High Fire Hazard Severity Zone.
>
> **MM 3.16-1b:** To reduce evacuation impacts, all residential and mixed-use projects on Inventory Sites and Opportunity Sites identified in the Housing Element, regardless of project location and regardless of the WUI or FHSZ, shall comply with the State fire safety regulations associated with access and egress standards for development in Very High Fire Hazard Severity Zones regardless of whether the project is located within a CAL FIRE-designated Very High Fire Hazard Severity Zone.

MM 3.16-1c: The City of Sausalito shall coordinate with the Southern Marin Fire Protection District and Marin County Fire Department to update evacuation planning data, routes, and zones on an annual basis. As part of the update, the evacuation planning and response tools shall consider proposed, approved, and completed housing and mixed use projects to ensure evacuation routes are adequate to accommodate existing, approved, and proposed projects.

Level of Significance after Mitigation
Significant and Unavoidable

Mitigation Measure 4.5-75 would reduce potential hazards associated with the potential for wildland fire hazards through requiring fire-safe building standards and maintenance of defensible space, ensure new development has adequate access and egress in the event of a wildland fire, and ensure that regional evacuation tools are updated to reflect new development. However, implementation of the Project and Alternative 5 would result in increased development in areas with Very High and High wildland fire hazard risks. This increase in development and population in these areas would result in exposing additional people and structures to direct and indirect risks associated with wildland fires and would also expose additional people and structures to indirect impacts associated with wildland fires. In order to fully mitigate this risk, both the Project and Alternative 5 would need to significantly reduce the amount of development anticipated for the City, reduce development in areas with very high and high fire hazard risks, and ensure that Citywide improvements are made to manage wildfire fuels, increase wildfire breaks, provide structural and property hardening against fire risks, and increase the capacity of evacuation routes. Such measures would render future residential and mixed use development projects that are necessary to accommodate Sausalito's housing needs infeasible, or significantly reduce the ability of such projects to accommodate very low, low, and moderate income households and encourage a diversity of housing types, accommodate special needs households, and affirmatively further fair housing. As described previously, future projects proposed under both the Project and Alternative 5 would be required to comply with fire protection measures in the SMFD Fire Ordinance, policies and programs within the General Plan, and the Sausalito Municipal Code. Further, continued implementation of the CWPP, Marin Operational Area Emergency Operations Plan, GGNRA Fire Management Plan, and recommendations identified within these plans and programs along with Mitigation Measure 4.5-75, will assist in protecting life and property in the event of a wildfire, and as identified above reduces potential impacts related to exposure to wildland fires and associated hazards. No additional feasible mitigation would reduce this impact to a less-than-significant level as development sites proposed by the Project and Alternative 5 are within the WUI and within fire hazard areas and would expose a substantial number of people and structures to wildland fire hazards and the increase in population and development would contribute to

indirect impacts associated with wildland fires, including increased evacuation times. Therefore, the impact would remain ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-76	**Implementation of Alternative 5 in or near State responsibility areas or lands classified as very high fire hazard severity zones would substantially impair an adopted emergency response plan or emergency evacuation plan. (See Impact 3.16-2 for Project impacts related to this topic)**

The following discussion is associated with potential impacts of the Project and Alternative 5 on implementation of emergency response plans and/or evacuation plans. Proposed emergency vehicle access to and from the future developments within the Plan area is addressed in Section 3.14, Transportation and Circulation.

As described previously, there are no SRAs or CAL FIRE-designated FHSZs in the Planning Area, although small areas of SRAs are located beyond the city limits across Highway 101 north of the city, which are categorized as a Very High FHSZ. As described previously, there are locally-designated very high fire threats areas located throughout the Planning Area within the WUI. Both the Project and Alternative 5 include Inventory Sites and Opportunity Sites within and near the WUI Very High Fire hazard area. Under Alternative 5, but not under the Project, Opportunity Site 14 is within a High WUI area. Opportunity Site 52 is in an Urbanized Unzoned area and is not designated as being in a high fire zone. Most of Site 84 is within a Very High WUI area; reducing the number of units on that site under Alternative 5 would reduce the amount of risk placed on residents. No roadways or other features are proposed or anticipated that would, through implementation of the Project or Alternative 5, physically alter the location of existing or planned evacuation routes or physically reduce the capacity of existing or planned roadways and evacuation routes.

All Opportunity Sites under the Project and Alternative 5 are located within portions of the city that are served by existing emergency services, and no changes to existing emergency services or emergency evacuation routes are proposed. Applicable emergency services and evacuation plans include the Marin EOP and MJHMP. Each of these plans is summarized briefly below, along with the county department responsible for their preparation and dates of planned updates.

Marin Operational Area Emergency Operations Plan: The EOP addresses inter-agency coordination and response to large-scale disasters countywide. The EOP is an all-hazard plan. Annexes to the EOP provide additional information relevant to a specific threat or response action, when needed. The EOP outlines the strategies, procedures, and organizational structures to be used in managing coordinated, large-scale disaster response, including evacuations, in the Marin County Operational Area (countywide).

While the EOP addresses responsibility for disaster response, including emergency evacuation, it does not establish any standards or requirements. Future development

associated with the Project and Alternative 5 would be accessed primarily by existing roadways. No new roads are provided for or contemplated in the Project or Alternative 5. Development under the Project and Alternative 5 would not create physical impediments or interfere with the use of the roadways for evacuation or response during an emergency. All future development associated with the Project and Alternative 5 would be required to meet the most current applicable State, SMFD, and City safety and emergency access and egress standards, including those regarding roadway width, turnarounds, and other necessary capacities. It is not anticipated that the Project or Alternative 5 would impede or interfere with implementation of the EOP.

Marin County Multi-Jurisdictional Local Hazard Mitigation Plan: The MJHMP reduces risks from disasters countywide, through addressing public awareness, aiding in decision-making to address vulnerabilities to future disasters, supporting eligibility for state and federal grant programs, and supporting coordination of hazard mitigation and response across local jurisdictions and emergency service providers. The MJHMP was updated in 2023. The MJHMP is not a regulatory plan and is not intended as an emergency response or emergency evacuation plan.

Community Wildfire Protection Plan: The CWPP is a countywide strategic plan with action items to reduce fire hazard in the County. The CWPP provides wildfire hazard and risk assessments, community descriptions, methods to addressing structural vulnerability to wildfire (e.g., home hardening and fuels management), recommendations for access and egress to accommodate emergency equipment and evacuations, and identifies projects which, if implemented, can serve to reduce wildfire hazards, reduce risk of loss of life, property loss, and environmental damage. Similar to the MJHMP, the CWPP is not regulatory and is not intended as an emergency response or emergency evacuation plan.

The emergency response and evacuation plans do not establish standards for evacuation times or response, but rather serve as a guide for disaster response, including evacuation planning. Future development applications under the Project and Alternative 5 will be evaluated by City departments for consistency with development standards including consistency with the Municipal Code and General Plan at the time they are proposed. As described in Section 3.14, Transportation and Circulation, the City has existing policies and practices in place that require emergency access to be analyzed during development project entitlement reviews. However, development and growth in the City under the Project and Alternative 5 would result in an incremental increase in demand and capacity for emergency evacuation within the Planning Area.

Evacuation Scenarios

Opportunity Sites identified for development under the Project or Alternative 5 are within the city and are not located within land designated by CAL FIRE as Very High VFHSZ or located within an SRA.

To understand how the Project may affect congestion and travel times in the city, Kittelson & Associates developed and analyzed evacuation scenarios to represent situations in which residents, employees, and visitors to the Plan area would have to evacuate. The evacuation scenarios considered for Alternative 5 would be the same as those under the Project. It is anticipated that the same primary and secondary evacuation routes would be used, but that there would be slightly fewer cars and people evacuating because there would be fewer housing units constructed under Alternative 5 as compared to the Project.

The City of Sausalito is located in Marin County, north of San Francisco, bounded by Marin City to the northwest and Richardson Bay on the east. Communities and businesses are oriented along Bridgeway. Evacuation trips from Sausalito are most likely to use Highway 101 or Bridgeway to travel north or south. Highway 101, also known as Redwood Highway, has four lanes in each direction within Sausalito. Near Sausalito, interchanges are present at:

- Donahue Street (north of Sausalito)
- Rodeo Avenue
- Monte Mar Drive
- Alexander Avenue (south of Sausalito)

Opportunity Site 14 is adjacent to the Highway 101 and Monte Mar Drive interchange.

The routes that would be used in the event of an evacuation include Bridgeway, Spencer Avenue, Alexander Avenue, Highway 101, Donahue Street, and Shoreline Highway. For persons residing on boats, or persons having access to boats, including the Golden Gate Ferry, evacuation could be potentially taken via Richardson Bay. Bridgeway runs parallel with Highway 101 within Sausalito. It has two lanes in each direction between Bridge Boulevard and Napa Street and has one lane in each direction with a center turn lane in most of the segments between Napa Street and Richardson Street. Opportunity Site 52 would be close to Bridgeway, and the primary evacuation route from Site 52 would be Bridgeway. East-west connections to get to Highway 101 or Bridgeway are mainly provided by local routes within Sausalito.

For the Project, Kittelson modeled evacuations for two emergency scenarios selected based on City staff input at the kickoff meeting for evacuation analysis. Through these discussions and the most likely emergency scenarios expected to impact the City, the scenarios identified for evacuation analysis include:

- Wildfire (PM Peak Period)
- Earthquake (PM Peak Period)

These emergency scenarios would also be applied to Alternative 5.

Kittelson & Associates, Inc. prepared a technical memorandum that presents the evacuation analysis methodology and results for the Project. Evacuation capacity analysis was

conducted for PM peak period. The results represent the peak period conditions for an evacuation when non-evacuation traffic would be at its highest levels. Kittelson ran two scenarios for this evacuation scenario for the Project:

- No Road Closure - both Highway 101 and Bridgeway remain open during evacuation.
- With Road Closure - the segments of Highway 101 and Bridgeway at the northern part of Sausalito are closed during evacuation.

As modeled and reported for the Project, Alternative 5 is also anticipated to have potential over-capacity conditions on several roadways in the City. Specifically, the roadways where volumes are projected to be at or exceed capacity within the evacuation zone for both the Project and Alternative 5 include:

No Road Closure

- Northbound Highway 101 from Donahue Street to Alexander Avenue
- Northbound Bridgeway from Princess Street to Richardson Street
- Northbound Second Street from Richardson Street to Alexander Avenue
- Northbound Alexander Avenue from South Street to Fort Baker Road
- Westbound Monte Mar Drive from Currey Avenue to northbound Highway 101 on ramp

With Road Closure

- Northbound Highway 101on ramp at Bridgeway
- Southbound Monte Mar Drive from northbound Highway 101 on ramp to Spencer Avenue
- Northbound Spencer Avenue from Monte Mar Drive to Wolfback Ringe Road
- Eastbound Rodeo Avenue from northbound Highway 101 ramp to Nevada Street
- Southbound Donahue Street from Highway 101 ramp to Alta Trail (Marin City)

This congestion reflects regular commute congestion in the City. The secondary roadways noted above mainly serve as parallel routes to Highway 101 as well as north-south connections in the City. Evacuating residents are expected to experience a similar level of congestion under Alternative 5 as under the Project. However, there may be some small differences from shifting units from Site 84 to Sites 14 and 52. For example, Site 84 is near Bridgeway, which serves as the City's primary evacuation route, and within three-quarters of a mile of Highway 101. Site 14 is also located near a Highway 101 freeway interchange. For evacuation scenarios where Highway 101 is the destination for evacuees, these two sites may perform similarly. In wildfire type evacuation scenarios, Site 14's location in a potentially more fire-prone area could be more constrained than Site 84. With respect to Site 52, comparing evacuation conditions to Site 84 is also likely to be highly variable depending on the type of disaster scenario. Site 52 is farther from Highway 101 than Site 84, so may be more constrained from an evacuation perspective if Highway 101 is the evacuation

destination. Conversely, if access becomes limited in the northern portion of Sausalito due to a disaster, Site 52's more southerly location could be less constrained than Site 84.

Wildfire Scenario: Northern Portion of the City
Kittelson ran two scenarios for this evacuation scenario for the Project:

- No Road Closure - both Highway 101 and Bridgeway remain open during evacuation.
- With Road Closure - the segments of Highway 101 and Bridgeway at the northern part of Sausalito are closed during evacuation.

The analysis considers PM peak period to understand travel patterns in this period. Impacts under Alternative 5 are anticipated to be similar.

The modeling indicates potential over-capacity conditions on several roadways in the City. Specifically, the roadways where volumes are projected to be at or exceed capacity within the evacuation zone include:

- 2040 Baseline Scenario with Evacuation
  - No Road Closure
    - Northbound Highway 101 from Donahue Street to Alexander Avenue
    - Northbound Bridgeway from Princess Street to Richardson Street
    - Northbound Second Street from Richardson Street to Alexander Avenue
    - Northbound Alexander Avenue from South Street to Fort Baker Road
    - Westbound Monte Mar Drive from Currey Avenue to northbound Highway 101 on ramp
  - With Road Closure
    - Northbound Highway 101on ramp at Bridgeway
    - Southbound Monte Mar Drive from northbound Highway 101 on ramp to Spencer Avenue
    - Northbound Spencer Avenue from Monte Mar Drive to Wolfback Ringe Road
    - Eastbound Rodeo Avenue from northbound Highway 101 ramp to Nevada Street
    - Southbound Donahue Street from Highway 101 ramp to Alta Trail (Marin City)
- 2040 Cumulative Scenario with Evacuation
  - No Road Closure
    - Northbound Highway 101 from Donahue Street to Alexander Avenue
    - Northbound Bridgeway from Napa Street to Richardson Street

- Northbound Second Street from Richardson Street to Alexander Avenue
- Northbound Alexander Avenue from South Street to Fort Baker Road
- Westbound Monte Mar Drive from Currey Avenue to northbound Highway 101 on ramp
- Westbound Spencer Avenue from Sausalito Boulevard to Wolfback Ringe Road

o With Road Closure

- Northbound Highway 101on ramp at Bridgeway
- Southbound Monte Mar Drive from northbound Highway 101 on ramp to Spencer Avenue
- Northbound Spencer Avenue from Monte Mar Drive to Wolfback Ringe Road
- Eastbound Rodeo Avenue from northbound Highway 101 ramp to Woodward Avenue
- Southbound Woodward Avenue from Rodeo Avenue to Cazneau Avenue
- Southbound Donahue Street from Highway 101 ramp to Alta Trail (Marin City)

Evacuation Travel Time Analysis

Traffic forecasts were prepared for wildfire scenario with evacuation for both with and without the Project scenarios. The average peak period travel time for all trips to and from evacuation origins and destinations under baseline conditions would be 7.72 minutes. With the Project, the number of evacuation trips would increase by 30.9% and the average travel time would increase by 29.1% to 9.97 minutes.

The average peak period travel times for all trips to and from evacuation origins and destinations under baseline conditions with roadway closures would be 9.42 minutes. With the Project, the number of evacuation trips would increase by 30.9% and the average travel time would increase by 91.3% to18.02 minutes. The Project has reduced development potential in core areas of the City and increased development potential in areas closer to the Bridgeway/Highway 101 interchange in comparison to the adopted Housing Element. It is anticipated that evacuation events under the Project, and under Alternative 5, would result in a similar increase in travel time along evacuation routes throughout the City.

Summary

Goals and policies contained with the General Plan provide guidance for preventative measures and practices to minimize wildland fire hazards and maintain adequate evacuation and access routes for vehicles in the event of an emergency, including wildland fires, which

would apply equally to the Project and Alternative 5. Examples include Policy HS-2.1, which requires publication of a disaster plan to identify disaster mitigation and evacuation; Policy HS-2.4, which ensures adequate access throughout the city for emergency vehicles equipment including ensuring adequate width of roadways; Policy HS-2.5 and related programs that prioritize undergrounding of overhead utilities that could hinder the movement of emergency vehicles; and Policy HS-2.6, which requires management of fuel loads in open space areas and maintenance of defensible space around residences. To the extent that these requirements facilitate emergency access, they also facilitate emergency evacuation which is further addressed in Policy HS-2.1, which promotes disaster mitigation and potential evacuation in the city.

Additionally, all development accommodated under both the Project and Alternative 5 will be required to demonstrate compliance with applicable codes and regulations. Emergencies and disasters, including wildfires, would continue to be addressed through implementation of the CWPP, Marin Operational Area Emergency Operations Plan, GGNRA Fire Management Plan, and recommendations identified in the 2020 SMFD WUI Wildfire Hazard and Risk Assessment to assist in the implementation of emergency plans and responses. Further, the California Fire Code establishes requirements for emergency access for fire apparatuses. Examples include requirements for multiple points for access for certain types of development, minimum street widths, and maximum acceptable grades for new roads. Chapter 8.42 of the Municipal Code requires development to demonstrate compliance with applicable fire safety measures prior to the issuance of building permits. Additionally, Program EQ-2.4.3 requires interagency coordination with respect to fire safety. As such individual new development projects under the Project and Alternative 5 would be assessed for compliance with applicable Fire Code requirements that pertain to emergency access as well as compliance with proposed policies and programs of the General Plan which would further enhance emergency response, as described. By involving the Police and Fire Departments in the development review process, the city ensures adequate emergency vehicle access and ensures that development is designed and operated in a manner that minimizes fire hazards and maximizes the potential for responsive emergency services.

In conclusion, development facilitated by the Project and Alternative 5 would place more people and structures in areas of the city that have been designated locally as WUI Very High and High fire hazard areas and within the Wildland Urban Interface. New development in wildfire risk areas has the potential to negatively impact the evacuation of both Opportunity Site residents and existing populations, while, at the same time, hampering emergency responders' access to the area. An overall increase in evacuation time and congestion would occur under the Project and Alternative 5, although evacuation times and access may be variable depending on the exact Opportunity site, type of emergency, location of the emergency, and destination of evacuees.

Therefore, impacts related to emergency evacuation as they relate to wildfire emergency scenarios would be considered ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-76 Implement Mitigation Measure 3.16-1a, b, and c.

> **MM 3.16-1a:** To reduce fire risk, all residential and mixed-use projects on Inventory Sites and Opportunity Sites identified in the Housing Element that are located in the WUI Very High and WUI High fire hazard areas or fire hazard severity zones as designated by the Sausalito Marin City Fire Protection District, City of Sausalito, or Marin County Fire Department shall comply with the State fire safety regulations associated with wildland-urban interfaces, fire-safe building standards, access and egress standards, and defensible space, including all standards for development in Very High Fire Hazard Severity Zones regardless of whether the project is located within a CAL FIRE-designated Very High Fire Hazard Severity Zone.
>
> **MM 3.16-1b:** To reduce evacuation impacts, all residential and mixed-use projects on Inventory Sites and Opportunity Sites identified in the Housing Element, regardless of project location and regardless of the WUI or FHSZ, shall comply with the State fire safety regulations associated with access and egress standards for development in Very High Fire Hazard Severity Zones regardless of whether the project is located within a CAL FIRE-designated Very High Fire Hazard Severity Zone.
>
> **MM 3.16-1c:** The City of Sausalito shall coordinate with the Southern Marin Fire Protection District and Marin County Fire Department to update evacuation planning data, routes, and zones on an annual basis. As part of the update, the evacuation planning and response tools shall consider proposed, approved, and completed housing and mixed use projects to ensure evacuation routes are adequate to accommodate existing, approved, and proposed projects.

Level of Significance after Mitigation
Significant and Unavoidable

Mitigation Measure 4.5-76 would ensure that new development proposed under the Project, and Alternative 5, by extension, provides adequate access and egress, and that the regional evacuation planning tools are updated to address individual developments under the Project and Alternative 5 as it is proposed, approved, and constructed. As described previously, future projects under both the Project and Alternative 5 would be required to comply with fire protection measures in the SMFD Fire Ordinance, policies and programs within the General Plan, and the Sausalito Municipal Code. Further, continued implementation of the CWPP, Marin Operational Area Emergency Operations Plan, GGNRA Fire Management Plan, and recommendations identified within these plans and programs, will assist in protecting life and property in the event of a wildfire, and would also guide future updates to emergency response and evacuation plans. However, even with the implementation of the mitigation measures and compliance with fire safety standards, both the Project and Alternative 5 would result in an increase in development that would significantly increase potential evacuation times and could interfere with evacuation and emergency response. The only method to completely avoid impacts would be to severely limit or remove the development potential under the Project or Alternative 5. These types of mitigations that could be considered for Alternative 5 as well as the Project are not consistent with the requirement for the Housing Element to encourage development of a variety of housing types, affirmatively further fair housing opportunities in the City, and accommodate the RHNA allocation in order to comply with Government Code Section 65863. Under Alternative 5, Site 52 is further from Highway 101 than Site 84, so may be more constrained from an evacuation perspective if Highway 101 is the evacuation destination. As such, this impact would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-77	**Implementation of Alternative 5 in areas located in or near State responsibility areas or lands classified as very high fire hazard severity zones would, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, due to slope, prevailing winds, and other factors. (See Impact 3.16-3 for Project impacts related to this topic)**

As described previously, there are no SRAs or CAL FIRE-designated FHSZs in the Planning Area, although small areas of SRAs are located beyond the city limits across Highway 101 north of the city, which are categorized as a Very High FHSZ. As described previously, there are locally-designated very high fire threats areas located throughout the Planning Area within the WUI. Both the Project and Alternative 5 include Inventory Sites and Opportunity Sites within and near the WUI Very High Fire hazard area. Under Alternative 5, but not under the Project, Opportunity Site 14 is within a High WUI area. Opportunity Site 52 is in an Urbanized Unzoned area and is not designated as being in a high fire zone. Most of Site 84 is within a Very High WUI area; reducing the number of units on that site under Alternative 5 would reduce the amount of risk placed on residents. No roadways or other features are

proposed or anticipated that would, through implementation of the Project or Alternative 5, physically alter the location of existing or planned evacuation routes or physically reduce the capacity of existing or planned roadways and evacuation routes.

The degree of wildland fire hazard would not substantially change with adoption of the Project or Alternative 5 compared to existing conditions. While implementation of the Project or Alternative 5 is not anticipated to exacerbate wildfire risks compared to existing conditions associated with slope and prevailing winds, both the Project and Alternative 5 would increase development and population in areas with very high fire hazard risks, thus increasing the potential to expose people to wildfire-related risks, including the exposure of future occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope or prevailing winds.

The surrounding region contains various slopes, which may have the potential to contribute to exacerbating wildfire risks based on the nature of their topography. Fire tends to burn and spread uphill. Within Sausalito lands generally slope uphill toward the west and neither the Project nor Alternative 5 involve changes to that are expected to increase or significantly change overall slope characteristics within the city.

As stated in Section 3.2, Air Quality, during the summer, the Pacific high-pressure cell is centered over the northeastern Pacific Ocean, resulting in stable meteorological conditions and a steady northwesterly wind flow, which would tend to move wildfire away from the more heavily populated areas of the city. Nevertheless, smoke from wildfires occurring in remote parts of the state has at times resulted in poor air quality throughout the Bay Area, as experienced during recent fire seasons.

Additionally, as described in Impact 4.5-75, development that brings more people into or near flammable wildlands leads to more frequent, intense, destructive, costly and dangerous wildfires. As such the potential to expose occupants to the uncontrolled spread of wildfire would be anticipated to increase under the Project and Alternative 5.

Development facilitated under the Project and Alternative 5 is required to be consistent with the GGNRA, County of Marin, SMFD, and City of Sausalito plans, policies, programs, and ordinances in place to reduce the risks associated with wildland fires. As described below, these existing policies and programs reduce the potential for exposure to wildland fires through preventative and proactive measures to reduce fuel load, maintain robust communications, and ensure access to evacuation routes.

The Fire Management Plan for the GGNRA identifies specific strategies that address preparedness, prevention, suppression, fuels management, rehabilitation, fire communication and education, monitoring, and fire and fuels research for the lands adjacent to and within the Sausalito Planning Area.

The MCM LHMP dedicates a subsection to wildfire and post-fire debris flow. The LHMP identifies the following to assist the County in reducing wildfire risk, which in turn can assist in reducing wildfire risk within the Sausalito Planning Area:

- Provide potential mitigation such as advance identification of evacuation routes and no parking zones near fire hazard zones, and expanding vegetation management.
- Ensure adequate water supply in high risk wildfire areas for local fire departments.

The Marin Operational Area EOP assists in inter-agency coordination in emergency operations. The city also participates in programs to reduce wildfire risks that are offered by SMFD, FIRESafe Marin, and CAL FIRE.

Furthermore, implementation of the CWPP and Marin Operational Area EOP include public education programs to reduce potential for fires to start, and also set action plans to remove flammable vegetation from around buildings and ensure adequate water supply in high risk wildfire areas. Reducing potential for fires to start and mitigating wildfire spread once started reduces exposure to smoke and air pollution. Safely evacuating people affected by wildfires also reduces exposure to air pollutants. General Plan Policy S-3.6 calls for reducing impacts of wildfires and wildfire smoke on public health, private and public property, and infrastructure. Program S-3.6.4 also recognizes the need to provide relief from the potential effects of wildfires on air quality and directs the city to coordinate facilities that can be used as designated community clean air shelters during poor air quality days, thus reducing the exposure of residents to pollutants.

Development facilitated by implementing the Project and Alternative 5 would be required to be consistent with the Sausalito Municipal Code, County of Marin, SMFD, EOP, and other relevant plans and requirements throughout the city that reduce the risk posed by wildfire. However, both the Project and Alternative 5 would ultimately result in increased building intensity and development including larger numbers of people and structures, and would place people and structures within areas of the city that are identified locally as having significant fire risks including lands delineated by the SMFD as being included within very high fire hazard severity areas, and within the WUI. Therefore, impacts related to the Project's and Alternative 5's potential to exacerbate wildfire risks, and thereby expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire through exposure would be considered ***potentially significant***.

As described previously, future projects developed under the Project or Alternative 5 would be required to comply with fire protection measures in the SMFD Fire Ordinance, CBC, policies and programs within the General Plan, and the Sausalito Municipal Code. Further, continued implementation of the CWPP, Marin Operational Area Emergency Operations Plan, GGNRA Fire Management Plan, and recommendations identified within these plans and programs, will assist in protecting life and property in the event of a wildfire, and as identified above reduces potential impacts related to exposure to wildland fires and

associated hazards. Development facilitated by the Project and Alternative 5 would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. An overall increase in the exposure of people to pollutant concentrations from wildfire would occur under the Project and Alternative 5. The potential impact would be similar under Alternative 5 as under the Project, and impacts would be ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
MM 4.5-77 Implement Mitigation Measure 3.16-1a.

> **MM 3.16-1a:** To reduce fire risk, all residential and mixed-use projects on Inventory Sites and Opportunity Sites identified in the Housing Element that are located in the WUI Very High and WUI High fire hazard areas or fire hazard severity zones as designated by the Sausalito Marin City Fire Protection District, City of Sausalito, or Marin County Fire Department shall comply with the State fire safety regulations associated with wildland-urban interfaces, fire-safe building standards, access and egress standards, and defensible space, including all standards for development in Very High Fire Hazard Severity Zones regardless of whether the project is located within a CAL FIRE-designated Very High Fire Hazard Severity Zone.

Level of Significance after Mitigation
Significant and Unavoidable

As described previously, future projects proposed under the Project or Alternative 5 would be required to comply with applicable fire protection measures. However, even with the implementation of Mitigation Measure 4.5-77 to ensure development is constructed to fire-safe standards and that wildfire reduction measures, such as defensible space, are implemented, and compliance with applicable fire safety standards, both the Project and Alternative 5 would result in an increase in development that could expose future occupants to pollutant concentrations associated with wildfire. The only method to completely avoid impacts would be to severely limit or remove the development potential under the Project or Alternative 5. These types of mitigations that could be considered for Alternative 5 as well as the Project are not consistent with the requirement for the Housing Element to encourage development of a variety of housing types, affirmatively further fair housing opportunities in the City, and accommodate the RHNA allocation in order to comply with Government Code Section 65863. Impacts under the Project and Alternative 5 would be similar as both could expose future occupants to pollution concentrations from wildfire. As such, this impact would be ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-78	**Implementation of Alternative 5 in areas located in or near State responsibility areas or lands classified as very high fire hazard severity zones would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities), but not to a degree to substantially exacerbate fire risk or result in significant temporary or ongoing impacts to the environment. (See Impact 3.16-4 for Project impacts related to this topic)**

As described previously, there are no SRAs or CAL FIRE-designated FHSZs in the Planning Area. Small areas of SRAs are located beyond the city limits across Highway 101 north of the city are categorized as a Very High FHSZ. As described previously, there are locally-designated very high fire threats areas located throughout the Planning Area within the WUI. Both the Project and Alternative 5 include Inventory Sites and Opportunity Sites within and near the WUI Very High Fire hazard area.

Electric utility infrastructure represents one potential cause of wildfire ignition. Other common sources include motorized equipment and vehicles required for ongoing maintenance activities. Historically, utility infrastructure has been responsible for less than 10% of reported wildfires. However, fires attributed to power lines consist of roughly half of the most destructive fires in California history.[72] Utilities undertake a wide range of activities to reduce the risk that their equipment starts a wildfire. One of the tactics utilities use is pro-actively shutting off the power at certain times and in particular locations when weather and fuel conditions increase the risk that equipment failure will lead to a catastrophic fire. This activity is called a Public Safety Power Shutoff (PSPS). In 2018, CPUC ruled that state law, under Public Utilities Code Sections 451 and 399.2(a), authorizes electric utilities to shut off electric power to protect public safety. Another tool utilities use to reduce the risk of utility equipment igniting a wildfire is adjusting the safety settings on the protective equipment on their power lines. Protective equipment, such as circuit breakers, reclosers, and fuses, are standard components of the grid that help keep workers and the public safe by automatically shutting off the power in a disturbance. During dry conditions in high fire-threat district areas, utilities modify the settings on protection devices to automatically turn off power faster if the system detects a potential problem, such as a foreign object coming into contact with an energized line.

On December 21, 2017, the CPUC issued its Decision Adopting Regulations to Enhance Fire Safety in the High Fire Threat District, adding statewide High Fire-Threat District (HFTD) map requirements to GO 95 and enhancing GO 95's fire safety regulations within HFTD areas (Decision 17-12-024). As described in the CPUC's HFTD maps, Sausalito as not within a Tier 3 – Extreme risk for destructive utility-associated wildfires area. Portions of the Planning Area west of Highway 101 are within the CPUC's Tier 2 – Elevated district. Future development within the city would be required to comply with the applicable provisions of the California

[72] CPUC Wildfire and Wildfire Safety. Available at: https://www.cpuc.ca.gov/industries-and-topics/wildfires

Building Code (CBC) and CA Fire Code (CFC). The utility infrastructure for individual projects under the Project or Alternative 5 would also be subject to the requirements established in the additional Public Resources Code including: Public Resources Code Section 4292, which requires clearing of flammable fuels for a minimum 10-foot radius from the outer circumference of poles and towers; and Public Resources Code Section 4293, which sets basic requirements for clearances around electrical conductors. Furthermore, the future projects would be required to meet vegetation clearance requirements outlined in Title 14, Section 1104.1(d) of the California Code of Regulations for single overhead facilities, and in CPUC General Order 95 requirements for overhead utility lines in high-fire-threat areas.

As discussed in Impact 4.5-69 and Impact 4.5-71, development accommodated by the Project and Alternative 5 is not anticipated to require or result in the relocation or construction of expanded wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects or exacerbate fire risk. However, Impact 4.5-69 does identify the potential for future water service upgrades for potential capacity upgrades, but does not identify the extension of services outside of already served areas (also see Section 3.15, Utilities and Service Systems). Opportunity Sites identified for residential development in the Project and Alternative 5 were selected in part based on the availability of existing services and is expected in areas where existing infrastructure (including highways and local roadways) and services are already in place, or nearby. Electric and natural gas infrastructure is required to be underground, reducing wildfire-related risks. Future development accommodated by the Project and Alternative 5may need to make roadway improvements, extend utilities to and individual development site, and maintain utilities. The implementation of the Project and Alternative 5 is not expected to significantly alter existing roadway and other infrastructure patterns and does not propose any new roadways or other major infrastructure improvements or extensions into undeveloped areas which would pose an additional or increase to wildfire risk. As such, neither the Project nor Alternative 5 propose or require the installation and maintenance of any new infrastructure that would substantially exacerbate fire risk beyond the existing risk levels. Impacts under Alternative 5 would be similar to those under the Project, and such impacts would be ***less than significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Less than Significant

Mitigation Measures
None Required

Level of Significance after Mitigation
Less than Significant

Impact 4.5-79	**Implementation of Alternative 5 in areas located in or near State responsibility areas or lands classified as very high fire hazard severity zones could substantially expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. (See Impact 3.16-5 for Project impacts related to this topic)**

As described previously, there are no SRAs or CAL FIRE-designated FHSZs in the Planning Area. Small areas of SRAs are located beyond the city limits across Highway 101 north of the city are categorized as a Very High FHSZ. As described previously, there are locally-designated very high fire threats areas located throughout the Planning Area within the WUI. Both the Project and Alternative 5 include Inventory Sites and Opportunity Sites within and near the WUI Very High Fire hazard area.

Future development accommodated by the Project or Alternative 5 would occur in areas that include existing development and infrastructure within the city limits. If a fire were to occur in the more flat and urbanized areas of the city, the risk of flooding or landslides afterward would negligible because of the nearly flat topography and because little soil would be exposed due to the developed conditions.

However, development under the Project and Alternative 5 may occur on vacant and infill parcels in areas of the city which contains sloping hillsides that are susceptible to landslides, and could be susceptible to flooding after fire has removed protective vegetative cover. These secondary hazards associated with wildfires are described in the MJHMP. In a post-fire scenario, wildfires can secondarily cause contamination of water resources, as well as transmission line and road destruction. Slopes that have been stripped of vegetation are exposed to greater amounts of erosive runoff, which can weaken soils and cause slope failure. Major landslides can occur several years after a wildfire. Most wildfires burn hot and for long durations and can bake soils, especially those high in clay content, thus increasing ground imperviousness and runoff generated by storm events, thereby increasing the chance of flooding.

The Project and Alternative 5 would add residential units and people to the city which could be susceptible to wildfire and post-wildfire impacts. Under Alternative 5, Site 14 is significantly sloped and could experience post-fire impacts. Site 52 is also on a sloped site, but in a more developed portion of the city. As a result, the degree of secondary wildland fire hazard exposure from additional residents and developments within the WUI and within locally designated fire threat areas would increase with implementation of the Project, and slightly more under Alternative 5. Furthermore, as described previously, the city has had a history of landslides that may also be exacerbated by post-fire conditions. The major post-wildfire hazards in Marin County are unstable hill slopes and altered drainage patterns. Slope instability from wildfire scarring of the landscape can result in slope instability in the form of more intensive flooding, landslides, and rockslides. These post-fire slope soils and altered

drainage patterns can more easily creep away downslope sides of foundations and reduce lateral support.

The implementation of projects, initiatives, policies, and programs by the SMFD would provide additional proactive measures to refine and enhance the resiliency of the city, as well as strengthening the city's review of new applications for development to ensure that potential exposure to secondary wildland fire hazards are reduced.

Development accommodated under Project and Alternative 5 could result in an increase in exposure of people and structures to wildland post fire hazards within the Planning Area as all future development would add more people and structures within the city and within areas that contain locally designated fire hazards. Development would place more people and structures in areas of the city that have been locally designated as high fire hazard areas, within the WUI, in areas with steep slopes, and in areas with high susceptibility to landslides that would be susceptible to post-fire hazard conditions.

Future projects under both the Project and Alternative 5 would be required to comply with fire protection measures in the SMFD Fire Ordinance. Furthermore, as described in Section 3.6, Geology, Soils, and Seismicity, and Section 3.9, Hydrology and Water Quality, all future development under the Project, and Alternative 5, would be subject to the rules and regulations of the Sausalito Municipal Code and the General Plan regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. However, as described previously, the Project and Alternative 5 would ultimately result in increased building intensity and development and would place people and structures with areas of the city that are identified locally as having significant fire risks including lands delineated by the SMFD as being included within very high fire hazard severity areas, and within the WUI. In addition, as described in Section 3.6, Geology, Soils, and Seismicity, slope stability is a concern through much of the sloped portions of the Planning Area and these areas risks could increase due to post-fire impacts from increased erosion risks to changes in vegetative cover, and increased runoff. Under Alternative 5, Site 14 could be subject to post-fire impacts due to its significant slope.

Therefore, impacts related to the Project's and Alternative 5's potential to exacerbate post-fire wildfire risks including exposure of additional people and structures to risks would be considered potentially significant. As described previously, future projects under the Project and Alternative 5 would be required to comply with fire protection measures in the SMFD Fire Ordinance, CBC, policies and programs within the General Plan, and the Sausalito Municipal Code. Further, continued implementation of the CWPP, Marin Operational Area Emergency Operations Plan, GGNRA Fire Management Plan would reduce impacts. The only method to completely avoid impacts would be to severely limit or remove the development potential under the Project or Alternative 5. These types of mitigations that could be considered for Alternative 5 as well as the Project are not consistent with the requirement for the Housing Element to encourage development of a variety of housing types, affirmatively

further fair housing opportunities in the City, and accommodate the RHNA allocation in order to comply with Government Code Section 65863. As such, this impact would be ***potentially significant*** for both the Project and Alternative 5.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
None Available

Minimized to the greatest extent feasible through General Plan policies and programs, compliance with local fire hazard and emergency operation plans, and through implementation of the building and municipal code. No additional feasible mitigation is available.

Level of Significance after Mitigation
Significant and Unavoidable

No additional feasible mitigation would reduce this impact to a less-than-significant level as Opportunity Sites and Inventory Sites under both the Project and Alternative 5 are within the WUI, and within identified fire hazard areas where slope and reductions in vegetative cover due to wildfire would result in and exacerbate post-fire slope instability and drainage changes. The only methods to completely avoid impacts would be to severely limit or remove the development potential under the Project or Alternative 5 that is in and near the WUI Very High fire hazard areas that are susceptible to fire and post-fire related hazards. Due to the extensive areas of the city designated as having hazard-related constraints, including high landslide susceptibility, potential for 100-year floods, and wildfire hazards, this type of mitigation for the Project, as well as Alternative 5, would limit areas of the city that would accommodate the city's housing needs to a degree that is not consistent with the requirement for the Housing Element to encourage development of a variety of housing types, affirmatively further fair housing opportunities in the City, and accommodate the RHNA allocation in order to comply with Government Code Sections 65580 et seq and 65863. Therefore, the impact would remain ***significant and unavoidable*** for both the Project and Alternative 5.

Impact 4.5-80	**Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to wildfire.**

Development and growth in the city would occur within the city limits in areas that include existing development. Development would result in an incremental increase in exposure of people and structures to wildland fires and associated hazards, particularly for development within the WUI. New development would be required to comply with the special fire protection measures identified in the SMFD Fire Ordinance. Continued implementation of

the Marin County Community Wildfire Protection Plan and Marin Operational Area Emergency Operations Plan will assist in protecting life and property in the event of a wildfire. The City would also continue to work and coordinate with other jurisdictions to minimize and reduce impacts.

All cumulative projects within the region would be subject to similar fire protection development standards and be required to comply with Marin County ordinances and General Plan policies to assist in protecting life and property in the event of a wildfire. In addition, all cumulative projects would be covered under existing emergency response plans by the County. Lastly, implementation of the HMP and Marin County Community Wildfire Protection Plan throughout the Planning Area and adjacent unincorporated areas, would also reduce cumulative impacts related to wildfire.

However, as described previously significant impacts have been identified under Impacts 4.5-75, 4.5-76, 4.5-77, 4.5-78 and 4.5-79. Alternative 5's incremental contribution to cumulative wildfire hazard impacts would be considered significant and cumulatively considerable. As previously discussed, Alternative 5 would add additional wildfire exposure and would require additional resources and improvements to reduce risks throughout the region. These would include additional stresses placed on evacuation routes. Additionally, as described in Chapter 3.15, Utilities and Service Systems, water supplies including those for fire suppression may also require improvements and would need regional reviews to determine the capacity to serve the additional populations identified by housing elements throughout the region, and the growth associated with meeting regional housing needs. These additional stresses leading to regional cumulative impacts would be considered ***potentially significant***, as it would be for the Project.

Level of Significance before Mitigation
Potentially Significant

Mitigation Measures
Minimized to the greatest extent feasible through General Plan policies and programs, compliance with statutory requirements, and utility plans, and through implementation of the municipal code that require individual projects to prove adequate emergency response and evacuation and utility capacity and infrastructure to support fire suppression needs prior to approval. No additional feasible mitigation is available.

Level of Significance after Mitigation
Significant and Unavoidable

No additional feasible mitigation would reduce Alternative 5's contribution to this impact to a less-than-considerable level aa the only method to completely avoid wildfire-related impacts would be to severely limit or remove the development potential under Alternative 5 that is in and near the WUI Very High and WUI high fire hazard areas that are susceptible to fire and post-fire related hazards. Due to the extensive areas of the city designated as having

hazard-related constraints, including high landslide susceptibility, potential for 100-year floods, wildfire hazards, and the extent to which the number of units required to be accommodated to meet the city's housing needs would result in increased delays in evacuation events, this type of mitigation would limit areas of the city that would accommodate the city's housing needs to a degree that is not consistent with the requirement for the Housing Element to encourage development of a variety of housing types, affirmatively further fair housing opportunities in the City, and accommodate the RHNA allocation in order to comply with Government Code Sections 65580 et seq and 65863.

Relationship to Significant and Unavoidable Impacts

Aesthetics

Aesthetics and view impacts would be similar under Alternative 5 as to the proposed Project (Impact 3.1-1 and Impact 4.5-1), except that localized views in the vicinity of Sites 14 and 52 would be changed due to new building structures on those sites and localized views in the vicinity of Site 84 could be improved compared to the Project. The development of Site 14 under Alternative 5 would obscure views of the ridgeline more than under the Project, while the lessening of development on Site 84 would improve views of the waterfront. With the reduction in units on Site 84, it is possible that building heights on that Opportunity Site could be lower than 45 feet, compared to the proposed Project.

Under Alternative 5, the addition of Site 14 near an eligible stretch of Highway 101 would introduce one additional site beyond the Project that could affect views, making the impact on scenic resources within an eligible State Highway slightly worse than under the Project (Impact 3.1-2 and Impact 4.5-2).

Under Alternative 5, Site 14 would be redeveloped from a two-story fire station to a three-story residential structure, slightly worsening views from the east toward the ridgelines as compared to the Project. However, the reduction of building height and mass on Site 84 under Alternative 5 would improve the visual character or quality of public views as compared to the Project (Impact 3.1-3 and Impact 4.5-3)

Under Alternative 5, residential and mixed use development anticipated could result in an increase in the intensity of new residential and non-residential development and increased building heights on some Opportunity Sites that could potentially conflict with applicable zoning and other regulations governing scenic quality and visual character in the urbanized portion of the Planning Area (Impact 3.1-4 and Impact 4.5-4).

Nighttime lighting (Impact 3.1-5 and Impact 4.5-5) would be increased on Site 14 under Alternative 5 as the existing onsite fire station is no longer in use, and only has minimum security lighting present. This illumination of Site 14 would be greater under Alternative 5 than under the Project. Under Alternative 5, nighttime lighting on Site 52 would change from surface parking lot illumination to urban uses, although the intensity of lighting on the site is not anticipated to change significantly. Lighting impacts on Site 52 would be similar under Alternative 5 as under the Project. Under Alternative 5, the intensity of development on Site 84 would be reduced as compared to the Project, as building height and mass would be reduced, as would the number of units present on the site, from 94 to 80. The potential for a further reduction to 50 units would further decrease new sources of light. Further, if no units are developed on Site 84, lighting levels could be maintained as they are now, with no effect on lighting emanating from Site 84.

Cumulative impacts to aesthetics and visual resources (Impact 3.1-6 and Impact 4.5-6) would be significant and unavoidable for both Alternative 5 and the Project due to the cumulative

increase in light and glare, changes to the localized and scenic views, and the potential to conflict with applicable zoning and other regulations governing scenic quality and visual character.

Cultural and Tribal Cultural Resources

The potential to encounter previously undiscovered archaeological resources during site-specific construction would be similar for both the Project and Alternative 5. (Impact 3.4-2 and Impact 4.5-19).

The potential to encounter previously undiscovered human remains during site-specific construction would be similar for both the Project and Alternative 5 (Impact 3.4-3 and Impact 4.5-20).

Although Alternative 5 would not introduce new Opportunity Sites to a sensitive archaeological zone, previously undiscovered tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k) could be encountered during site-specific construction under both the Project and Alternative 5 (Impact 3.4-4 and Impact 4.5-21).

While Alternative 5 would result in development of two additional Opportunity Sites beyond those anticipated in the Project, the likelihood of encountering a tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, is determined to be significant for both the Project and Alternative 5 pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 (Impact 3.4-5 and Impact 4.5-22).

Cumulative impacts associated with historic, cultural, and tribal cultural resources would be similarly significant and unavoidable for both Alternative 5 and the Project as described under Impact 4.5-23 (Impacts 3.4-6 and 4.5-23).

Transportation and Circulation

Alternative 5 would lower the amount of VMT per capita as compared to the Project resulting in a slight reduction under this impact in comparison to the Project, but the decrease would not result in a measurable change to Sausalito's VMT per capita and significance thresholds would be exceeded under the Project and Alternative 5 (Impact 3.14-2 and Impact 4.5-65).

As described under Impact 4.5-68, cumulative impacts associated with transportation and circulation VMT impacts would be similarly significant and unavoidable under both the Project and Alternative 5 (Impact 3.14-5 and Impact 4.5-68).

Utilities and Service Systems

Alternative 5 and the Project would require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects (Impact 3.15-1 and Impact 4.5-69). However, Alternative 5 would

produce fewer residential units to the city and would add fewer new residents, resulting in a slight reduction under this impact in comparison to the Project.

As described under Impact 4.5-74, cumulative impacts associated with water supply would be similarly significant and unavoidable for both the Project and Alternative 5 while cumulative impacts associated with wastewater, solid waste, storm drainage, and electric power, natural gas, and telecommunications would be less than significant (Impact 3.15-6 and Impact 4.5-74).

Wildfire

Opportunity Site 14 is within a High WUI area and Alternative 5 would place new residents there under Alternative 5. Most of Site 84 is within a Very High WUI area, and reducing the number of units on that site under Alternative 5 would reduce the amount of risk placed on new residents. Potential impacts under Alternative 5 would be slightly less than under the Project because Alternative 5 would accommodate fewer housing units and fewer new residents and the potential to accommodate development on Sites 14 and 52 rather than Site 84 would result in an overall reduction in the exposure to risks associated with a Very High WUI area (Impact 3.16-1 and Impact 4.5-75).

Under Alternative 5, but not under the Project, Opportunity Site 14 is within a High WUI area. Opportunity Site 52 is in an Urbanized Unzoned area and is not designated as being in a high fire zone. Most of Site 84 is within a Very High WUI area; reducing the number of units on that site under Alternative 5, along with potential increases to Opportunity Sites 14 and 52, would reduce the amount of risk placed on residents (Impact 3.16-2 and Impact 4.5-76). Opportunity Sites under the Project and Alternative 5 are located within portions of the city that are served by existing emergency services. Evacuating residents are expected to experience a similar level of congestion under Alternative 5 as under the Project. However, there may be some small differences from shifting units from Site 84 to Sites 14 and 52. For example, Site 84 is near Bridgeway, which serves as the City's primary evacuation route, and within three-quarters of a mile of Highway 101. Site 14 is also located near a Highway 101 freeway interchange. For evacuation scenarios where Highway 101 is the destination for evacuees, these two sites may perform similarly. In wildfire type evacuation scenarios, Site 14's location in a potentially more fire-prone area could be more constrained than Site 84. With respect to Site 52, comparing evacuation conditions to Site 84 is also likely to be highly variable depending on the type of disaster scenario. Site 52 is farther from Highway 101 than Site 84, so may be more constrained from an evacuation perspective if Highway 101 is the evacuation destination. Conversely, if access becomes limited in the northern portion of Sausalito due to a disaster, Site 52's more southerly location could be less constrained than Site 84.

Both the Project and Alternative 5 include Inventory Sites and Opportunity Sites within and near the WUI Very High Fire hazard area (Impact 3.16-3 and Impact 4.5-77). Under Alternative 5, but not under the Project, Opportunity Site 14 is within a High WUI area. Opportunity Site

52 is in an Urbanized Unzoned area and is not designated as being in a high fire zone. Most of Site 84 is within a Very High WUI area; reducing the number of units on that Site 84 and accommodating development on Sites 14 and 52 under Alternative 5 would reduce the overall amount of risk placed on residents. No roadways or other features are proposed or anticipated that would, through implementation of the Project or Alternative 5, physically alter the location of existing or planned evacuation routes or physically reduce the capacity of existing or planned roadways and evacuation routes. Development facilitated by the Project and Alternative 5 would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. An overall increase in the exposure of people to pollutant concentrations from wildfire would occur under the Project and Alternative 5. The potential impact would be similar under Alternative 5 as under the Project.

The Project and Alternative 5 would add residential units and people to the city which could be susceptible to wildfire and post-wildfire impacts. Under Alternative 5, Site 14 is significantly sloped and could experience post-fire impacts. Site 52 is also on a sloped site, but in a more developed portion of the city. As a result, the degree of secondary wildland fire hazard exposure from additional residents and developments within the WUI and within locally designated fire threat areas would increase with implementation of the Project, and slightly more under Alternative 5 (Impact 3.16-5 and Impact 4.5-79).

Cumulative impacts associated with wildfire would be similarly significant and unavoidable for both Alternative 5 and the Project as described under Impact 4.5-80 (Impacts 3.16-6 and 4.5-80).

Relationship to Project Objectives

Alternative 5 would meet the first project objective by updating the General Plan's Housing Element to identify policies and implementation programs to comply with the State's requirement to facilitate the development of more housing.

Alternative 5 would also meet the second project objective by establishing an inventory of housing sites with enough capacity to meet the State's RHNA requirements to accommodate 724 units of varying income levels. However, the excess capacity beyond the State-mandated 724 units would be less under Alternative 5 than the proposed Project. Alternative 5 would develop as few as 1,093 units and as many as 1,133 units. Under the proposed Project, there would be an excess capacity of 423 units; under Alternative 5, that excess capacity would be reduced to 369-409 units. Although more sites could be rezoned under Alternative 5, fewer units could be constructed than the proposed Project. Therefore, Alternative 5 does not meet the second project objective as well as the proposed Project.

Alternative 5 would result in amendments to the General Plan to maintain internal consistency across elements, similar to the proposed Project.

Alternative 5 would also meet the fourth project objective by affirmatively furthering fair housing while preserving the character of the City. Under this alternative, two additional Opportunity Sites could be developed, Site 14 and Site 52, further distributing housing units throughout the city. Further, the reduced unit count on Site 84 to 80 units could improve views of Richardson Bay from west of MLK Property because there would be a reduction in building mass and the height of a portion of the buildings on the site could be lower than 45 feet. The potential for a further reduction to 50 units would further decrease building mass and would likely result in building heights of 32 feet or less. Further, if no units are developed on Site 84, views could be maintained as they are now, with no effect on views to or from Site 84. This would preserve the character of the neighborhood, and would reduce aesthetic impacts, keeping building heights, materials, and densities largely as they currently exist on Site 84.

Alternative 5 – Other CEQA Considerations

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental effects of Alternative 5 on various aspects of the environment are discussed in detail above. Project-specific and cumulative impacts that cannot be avoided if Alternative 5 is approved are identified below.

Alternative 5-Specific Significant and Unavoidable Impacts

Impact 4.5-1: Development facilitated by Alternative 5 would have a substantial adverse effect on a scenic vista.

Impact 4.5-2: Implementation of Alternative 5 would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a State scenic highway.

Impact 4.5-3: Development facilitated by Alternative 5 would substantially degrade the existing visual character or quality of public views in non-urbanized areas. (Public views are those that are experienced from publicly accessible vantage points).

Impact 4.5-4: Implementation of Alternative 5 would substantially conflict with applicable zoning and other regulations governing scenic quality in urbanized areas.

Impact 4.5-5: Development facilitated by Alternative 5 would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact 4.5-19: Development facilitated by Alternative 5 could result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Impact 4.5-20: Implementation of the Alternative 5 could result in disturbance of human remains, including those interred outside of formal cemeteries.

Impact 4.5-21: Implementation of Alternative 5 could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k).

Impact 4.5-22: Implementation of Alternative 5 could cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Impact 4.5-65: Implementation of Alternative 5 would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (a).

Impact 4.5-69: Implementation of Alternative 5 could require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage,

electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects (water supply).

Impact 4.5-75: Implementation of Alternative 5 could result in the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Impact 4.5-76: Development facilitated by Alternative 5 in or near State responsibility areas or lands classified as very high fire hazard severity zones would substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact 4.5-77: Development facilitated by Alternative 5 to implement the Housing Element in areas located in or near State responsibility areas or lands classified as very high fire hazard severity zones would, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, due to slope, prevailing winds, and other factors.

Alternative 5 Cumulative Significant and Unavoidable Impacts

Impact 4.5-6: Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to aesthetics.

Impact 4.5-23: Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impacts with respect to historic, cultural, or tribal cultural resources.

Impact 4.5-68: Implementation of Alternative 5, in conjunction with cumulative development, would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (a).

Impact 4.5-74: Development facilitated by Alternative 5, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to water supply, wastewater, solid waste, and storm drain facilities (water supply).

Impact 4.5-80: Development facilitated Alternative 5, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to wildfire.

Significant Irreversible Environmental Changes

Under CEQA, an EIR must analyze the extent to which a project's primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage (CEQA Guidelines Sections 15126.2(d) and 15127). Section 15126.2(d) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The evaluation in this section addresses whether Alternative 5 would result in significant irreversible environmental changes if it would do any of the following:

- Involve a large commitment of nonrenewable resources.
- Result in primary or secondary impacts that would generally commit future generations to similar uses.
- Involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.
- Result in consumption of resources that is not justified (e.g., involve the wasteful use of energy).

Long-Term Commitment of Resources

Alternative 5 contemplates development of up to 1,133 new dwelling units and 5,171 square feet of new nonresidential uses at buildout, which is anticipated in 2031 coinciding with the conclusion of the 6th Cycle RHNA.

Construction would include use of building materials such as petroleum-based products and metals that cannot reasonably be recreated. Construction also would involve significant consumption of energy, usually petroleum-based fuels that deplete supplies of nonrenewable resources. Construction of structures and infrastructure would consume energy and water. Construction debris recycling practices would be expected to allow for recovery and reuse of building materials such as concrete, lumber, and steel, and would limit disposal of these materials, some of which are non-renewable. Additionally, construction equipment would have to meet Bay Area Air Quality Management District (BAAQMD) standards as described in Section 3.2, Air Quality. Section 3.5, Energy, addresses appropriate consumption of energy for development construction.

Once construction is complete, which is expected to be after eight years, land uses associated with buildout of Alternative 5 would use some nonrenewable fuels to heat and light structures and would consume water. New residential uses would be required to be built and adhere to the latest adopted edition of the California Green Building Standards Code, which would reduce energy demand, water consumption, and wastewater and solid waste generation that would collectively reduce demand for resources. This would lessen

emissions and generation of pollution and effluent, and so the severity of corresponding environmental effects. Due to the uncertainty regarding exact development proposals under Alternative 5, it is unknown as to exactly how individual development projects would achieve energy reduction, water conservation, and conservation of other non-renewable resources. Therefore, it is possible that implementation of Alternative 5, similar to the Project, could result in an irretrievable commitment of non-renewable resources, and energy for heat and light and water for irrigation and plumbing could be consumed inefficiently, unnecessarily, or wastefully.

Commitment of the Project Site for Future Generations

Similar to the Project, development allowed under Alternative 5 would dedicate the project area to urbanized land uses, thereby precluding other uses for the life span of the development, generally estimated to be for the foreseeable future. The most notable impacts would be increased generation of pollutants from vehicle travel and stationary operations, and the short-term commitment of nonrenewable and/or slowly renewable natural and energy resources, such as water resources, during construction activities. Operations associated with future uses would also consume natural gas and electrical energy. The unavoidable consequences of Alternative 5 are described above in the impact analysis under the Alternative 5 – Modified Project heading.

Irreversible Environmental Damage

Similar to the Project, implementation of Alternative 5 may have the potential to cause significant environmental accidents through hazardous material releases into the environment during construction activities, or through operation of new commercial or mixed-use land uses. However, compliance with State law and implementation of a Stormwater Pollution Prevention Plan (SWPPP) during construction activities would ensure that future development would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials (see Impacts 4.5-37 through 4.5-42).

Over the past decade, the understanding of global climate change and the role that communities can play in addressing it has grown tremendously. There is a scientific consensus that recent increases in global temperatures are associated with corresponding increases of greenhouse gases (GHGs). This temperature increase is beginning to affect regional climates and is expected to result in impacts on the Bay Area region and the world. Climate change has profound implications for the availability of the natural resources on which economic prosperity and human development depend.

As discussed in detail in Section 3.7, Greenhous Gas Emissions, GHG emissions are known to have long-term effects on atmospheric conditions that affect the global climate, with resultant changes in sea level and hydrologic conditions in rivers, heat island effects, and a range of other conditions. These changes are not considered irreversible, but they could last

for generations. As described further in Impacts 4.5-34 through 4.5-36, Alternative 5 could result in short-term increases in GHG emissions as would the Project. However, compliance with the City's General Plan policies and programs, adherence to the development standards in the Sausalito Municipal Code, as well as consistency with the 2022 California Buildings Standards and the latest version of the CALGreen Code would ensure that potential new development associated with implementation of the project would not directly or indirectly generate GHG emissions that may have a significant impact on the environment.

According to California Department of Forestry and Fire Protection (CAL FIRE), there are no Very High Fire Hazard Severity Zones within the city. However, there are several sites proposed for development under Alternative 5 that are within High, or Moderate Fire Hazard Severity Zones as mapped by Marin County. Two sites, Site 73 (Dr. Martin Luther King, Jr. Academy - Nevada Campus) and Site 84 (MLK Park), would be rezoned from Public Institutional (PI) to Housing-49 and MU-49/85%, respectively. Development anticipated under Alternative 5 is generally focused in infill areas, within the currently city limits, and in already developed areas of the city; however, development could result in an incremental increase in exposure of people and structures to wildland fires and associated hazards as implementation of Alternative 5 would add more people and structures within the city. No areas or development would be included within or adjacent to VHFSZs as designated by CAL FIRE. However, as with the Project, development allowed and facilitated by Alternative 5 would place more people and structures in areas of the city that have been designated as high fire hazard areas and within the Wildland Urban Interface (see Section 3.16, Wildfire and Impacts 4.5-75 through 4.5-80). In addition, as discussed in Impacts 4.5-60 through 4.5-63, existing fire protection facilities would be adequate to serve development anticipated under Alternative 5. However, implementation of Alternative 5 and the Project could have potential to result in significant environmental accidents related to wildfire hazards and could result in significant irreversible environmental changes (see Impacts 4.5-75 through 4.5-80).

Unjustified Consumption of Resources

Resources that would be permanently and continually consumed by implementation of Alternative 5 include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources (see Impacts 4.5-24 through 4.5-26, and Impacts 4.5-69 through Impact 4.5-74). Similar to the Project, Alternative 5's operational activities would comply with all applicable building codes, including the 2022 Title 24 Energy Efficiency Standards as well as planning policies and standard conservation features. Such compliance would ensure that natural resources are conserved to the maximum extent required under existing regulations.

It is possible that, over time, new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce reliance on nonrenewable natural resources. Nonetheless, construction activities for Alternative 5 would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil

fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment, similar to the Project.

Growth-Inducing Impacts

There are two types of growth-inducing impacts: direct and indirect. To assess potential for growth-inducing impacts, General Plan Elements that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated (CEQA Guidelines Section 15126.2(e)). CEQA Guidelines, as interpreted by the City, state that a significant growth-inducing impact may result if implementation of Alternative 5 would:

- Induce substantial population growth in an area (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/ intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

Direct growth-inducing impacts occur when development imposes new burdens on a community by directly inducing population growth, or by leading to construction of additional developments in the same area. Also in this category is removal of physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure cannot be considered isolated from the development they facilitate and serve. Physically removing obstacles to growth, or indirectly inducing growth may provide a catalyst for future unrelated development in an area, such as a new residential community that requires additional commercial uses to support residents.

Implementing Alternative 5 would continue the planned for growth in the city in a manner consistent with citywide land use densities/intensities and the 2023-2031 Housing Element. The California Department of Finance estimated the total population of the City of Sausalito to be 7,114 as of April 1, 2020, with a decrease in population to 6,865 by January 1, 2023.[73] The City projects a population of 7,883 by 2040 based on buildout of the General Plan. Alternative 5 would result in the construction of up to 1,133 dwelling units. Using an average household size of 1.71,[74] Alternative 5 would result in the addition of approximately 1,938

[73] State of California Department of Finance. 2023. E-4 Population Estimates for Cities, Counties, and the State, 2021-2023, with 2020 Benchmark. May 1. Available: https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2024-with-2020-census-benchmark/. Accessed June 10, 2024.

[74] State of California Department of Finance. 2023. E-4 Population Estimates for Cities, Counties, and the State, 2021-2023, with 2020 Benchmark. May 1. Available:

residents to the city, or 24.7 percent of the total projected 2040 population. Therefore, direct population growth as a result of Alternative 5 is considered significant, similar to the Project. The potential environmental impacts resulting from this direct population growth is analyzed in Impacts 4.5-1 through 4.5-80 of this EIR.

Underdeveloped and vacant lots would be redeveloped in the built-out, urbanized community of Sausalito; however, some physical constraints to growth currently exist in the project vicinity. The primary growth obstacle in the availability of domestic water supply. MMWD has indicated can meet future demands for the district, including Sausalito, under normal, single-dry year, and multiple-dry year scenarios. As demonstrated in the MMWD UWMP, MMWD has enough water supply in 2045 to accommodate all of the RHNA plans within the District, including development projected under Alternative 5. The MMWD is projected to have sufficient supplies to meet projected demands in normal years, single dry years, and multiple dry years through 2045.[75]

In addition to residential units, direct growth from Alternative 5 is projected to include up to 5,171 square feet of nonresidential uses, which could add approximately 3-5 jobs. The city is already a well-developed area with a suburban residential character. Infrastructure and services would be expanded as necessary to serve city growth, without significant excess capacity, and thus would not encourage additional growth beyond that already planned for in Alternative 5. As a result, Alternative 5 would create minimal to no indirect growth, and the planned buildout would be consistent with City projections.

Similar to the Project, Alternative 5 would also not significantly or adversely affect the permanent jobs/housing balance. Implementation of Alternative 5 would allow for creation of a small amount of nonresidential development and jobs, but would not create a housing demand above what would otherwise occur in the city. Alternative 5 is intended to provide more housing for a spectrum of income levels, allowing more residents to live closer to their jobs. Alternative 5 could allow for up to 1,133 residential units and up to approximately 1,938 new residents. The city is served by transportation infrastructure, including several Golden Gate Transit stops and two ferry services. Therefore, implementing Alternative 5 would help the city achieve a more even job/housing balance by providing much-needed housing.

The city is already well-developed, thus implementing Alternative 5 would not likely require extensions of electrical, natural gas, or water utility infrastructure, but would require connections to existing infrastructure on and adjacent to future projects. Alternative 5 would not extend urban infrastructure other than to future projects within the city, and thus would not induce growth in other areas outside the city limits. Furthermore, Alternative 5 would be

https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2024-with-2020-census-benchmark/. Accessed June 10, 2024.

[75] Marin Municipal Water District, 2024. Updated 2020 Urban Water Management Plan for Marin Municipal Water District. January. Page 91.

compatible with existing residential and commercial uses and not pressure adjacent areas to redevelop with new or different land uses. As a result, it is not anticipated that nearby residents would relocate. Therefore, similar to the Project, Alternative 5 would not remove a barrier to growth nor create an indirect population increase.

Since Alternative 5 would not result in indirect growth, negatively alter the existing jobs/housing balance, or be inconsistent with the 2023-2031 Housing Element, growth-inducing impacts would be less than significant, similar to the Project.

Elimination of Obstacles to Growth

The elimination of physical obstacles to growth is considered a growth-inducing effect and one way a project may remove an impediment to growth would be through establishment of an essential public service. Here, Alternative 5 would not establish an essential service such as a fire station, hospital, water treatment plant. Implementation of Alternative 5 would occur in a built-out, urbanized area of the Bay Area; however, some physical constraints to growth currently exist in the city. Some growth obstacles in the city include steep slopes, possibility for wildfire or tsunami hazards, and sufficient evacuation routes in the event of an emergency. Implementing Alternative 5 would not eliminate the above-stated growth obstacles nor exacerbate those conditions. No infrastructure expansion would be needed to support growth anticipated under Alternative 5, and Alternative 5 t would not extend services to areas not already served by the existing network of infrastructure. As stated earlier, Alternative 5 would generate a small amount of employment and provide housing units to meet the City's RHNA requirement. The anticipated development under Alternative 5 would be within the growth projections established in the General Plan, and within the growth assumptions in Plan Bay Area 2050. Therefore, similar to the Project, Alternative 5 would not induce growth beyond the growth planned for by the City, Association of Bay Area Governments (ABAG), or Metropolitan Transportation Commission (MTP).

Economic Effects

Implementation of Alternative 5 is anticipated to produce 3-5 new jobs and approximately 1,938 new residents. In addition to the employment growth generated by Alternative 5, additional local employment could be generated through what is commonly referred to as the *multiplier effect*. The multiplier effect refers to the secondary economic effects caused by spending from project-generated residents and employees. The multiplier effect tends to be greater in regions with larger diverse economies, given a decrease in the requirement to import goods and services from outside the region, as compared to the effects of spending in smaller economies where goods and services must be imported from elsewhere.

Two different types of additional employment are tracked through the multiplier effect. Indirect employment includes the additional jobs generated through residents' expenditure patterns and direct employment associated with the proposed project. For example, future residents and workers in the mixed uses generated by Alternative 5 would spend money in

the local economy, and the expenditure of that money would result in the creation of additional jobs. Indirect jobs tend to be relatively close to places of employment and residences.

The multiplier effect also calculates *induced employment*. Induced employment follows the economic effect of employment beyond the expenditures of employees in the project area to include jobs created by the stream of goods and services necessary to construct projects and support businesses in the project area. For example, when a manufacturer buys or sells products, the employment associated with those inputs or outputs is considered induced employment.

The multiplier effect also considers the secondary effect of employee expenditures. Thus, it includes the economic effect of the dollars spent by those employees who purchase goods and services in support of the jobs created by implementation of the proposed project. Increased employment in the city would support increased purchases of supplies, equipment, and services from businesses in Sausalito and nearby cities and from businesses located elsewhere in the region. The increased spending also would initiate subsequent rounds of additional business spending by those and other businesses. Increased employment in the project area under Alternative 5 would provide increased wage and salary incomes that would support additional household spending for a wide variety of goods and services.

Given the small number of jobs created by Alternative 5, it is unlikely that Sausalito would experience an economic effect directly attributable to implementation of Alternative 5, similar to the effects of the Project. Further, the actual environmental consequences of this type of economic growth are too speculative to predict or evaluate, because they can be spread throughout the Bay Area.

~~4.5~~4.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The qualitative environmental effects of each alternative in relation to the Amended Housing Element project are summarized in **Table 4-~~12~~713**.

CEQA Guidelines Section 15126(e)(2) requires an EIR to identify an environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. Here, the No Project Alternative is the environmentally superior alternative.

From the alternatives to the proposed Project evaluated in this EIR, the environmentally superior alternative would be Alternative 2 as it would have fewer impacts on the environment than the proposed Project, as shown in Table 4-~~12~~713.

TABLE 4-~~12~~7~~13~~13: COMPARISON OF ALTERNATIVES

ENVIRONMENTAL TOPIC AREA	AMENDED HOUSING ELEMENT SIGNIFICANCE LEVEL	ALTERNATIVE 1A NO PROJECT/NO REZONING	ALTERNATIVE 1B NO PROJECT/ADOPTED ELEMENT IMPLEMENTATION	ALTERNATIVE 2 REDUCED SITES	ALTERNATIVE 3 MODIFIED SITES	ALTERNATIVE 4 HISTORIC PRESERVATION	ALTERNATIVE 5 MODIFIED PROJECT
Aesthetics, Light, and Glare	SU	Less	Worse	Less	Less	Less	Similar
Air Quality	LTS	Less	Less	Less	Less	Less	Less
Biological Resources	LTSWM	Similar	Similar	Less	Less	Similar	Similar
Cultural Resources/Tribal Cultural Resources	SU	Similar	Worse	Less	Less	Less	More
Energy	LTS	Less	Similar	Less	Similar	Less	Less
Geology, Soils, and Seismicity	LTSWM	Less	Similar	Less	Less	Less	Similar
Greenhouse Gas Emissions	LTS	Less	Worse	Less	Less	Less	Less
Hazards and Hazardous Materials	LTS	Less	Similar	Less	Similar	Similar	Similar
Hydrology and Water Quality	LTSWM	Similar	Similar	Less	Similar	Less	Similar
Land Use	LTS	Less	Similar	Less	Less	Less	Similar
Noise	LTSWM	Less	Similar	Similar	Similar	Less	Similar
Population and Housing	LTS	Less	Similar	Similar	Similar	Less	Similar
Public Services and Utilities	LTS	Less	Similar	Less	Similar	Less	Less
Transportation	SU	Less	Worse	Less	Less	More	Less
Utilities and Service Systems	SU	Less	Similar	Less	Similar	Less	Less
Wildfire	SU	Less	Similar	Less	Similar	Less	Similar

Notes:
NI = No Impact
LTS = Less than Significant
LTSWM = Less than Significant with Mitigation
SU = Significant and Unavoidable

ENVIRONMENTAL TOPIC AREA	AMENDED HOUSING ELEMENT SIGNIFICANCE LEVEL	ALTERNATIVE 1A NO PROJECT/NO REZONING	ALTERNATIVE 1B NO PROJECT/ADOPTED ELEMENT IMPLEMENTATION	ALTERNATIVE 2 REDUCED SITES	ALTERNATIVE 3 MODIFIED SITES	ALTERNATIVE 4 HISTORIC PRESERVATION	ALTERNATIVE 5 MODIFIED PROJECT

Source: De Novo Planning Group, 2024.



LEGEND

- Sausalito City Boundary
- Neighborhood
- Existing Opportunity Site 84
- Expanded Opportunity Site 84

CITY OF SAUSALITO AMENDED HOUSING ELEMENT EIR

Figure 4-1.
Considered but Rejected: Expanded Opportunity Site 84

Sources: City of Sausalito; Marin GeoHub. Map date: August 9, 2024.

DE NOVO PLANNING GROUP
A LAND USE PLANNING, DESIGN, AND ENVIRONMENTAL FIRM



LEGEND

- Sausalito City Boundary
- Neighborhood
- Housing Element Sites

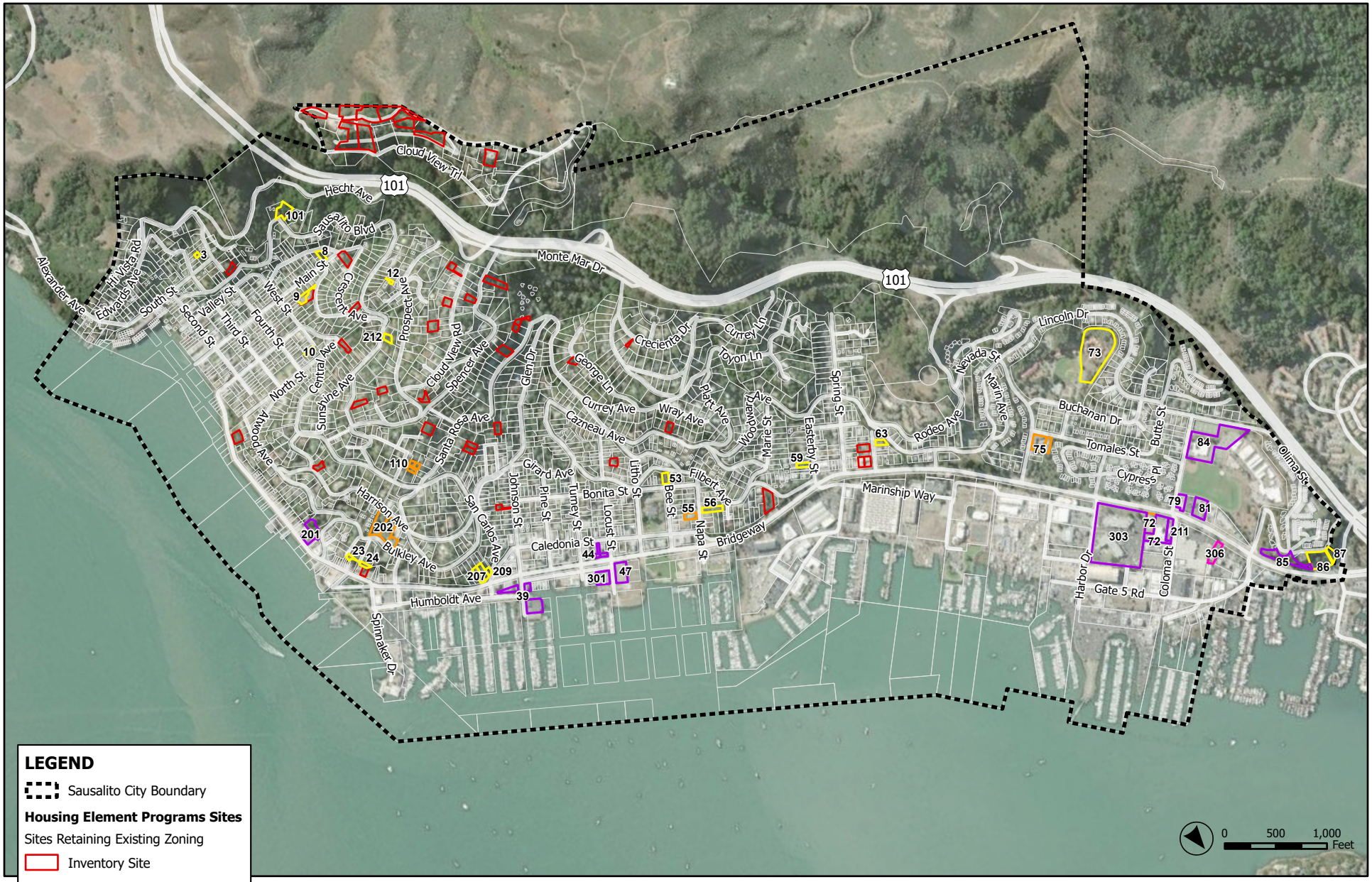
CITY OF SAUSALITO AMENDED HOUSING ELEMENT EIR

Figure 4-2.

Alternative 1A: No Project/No Rezoning

Sources: City of Sausalito; Marin GeoHub. Map date: August 27, 2024.

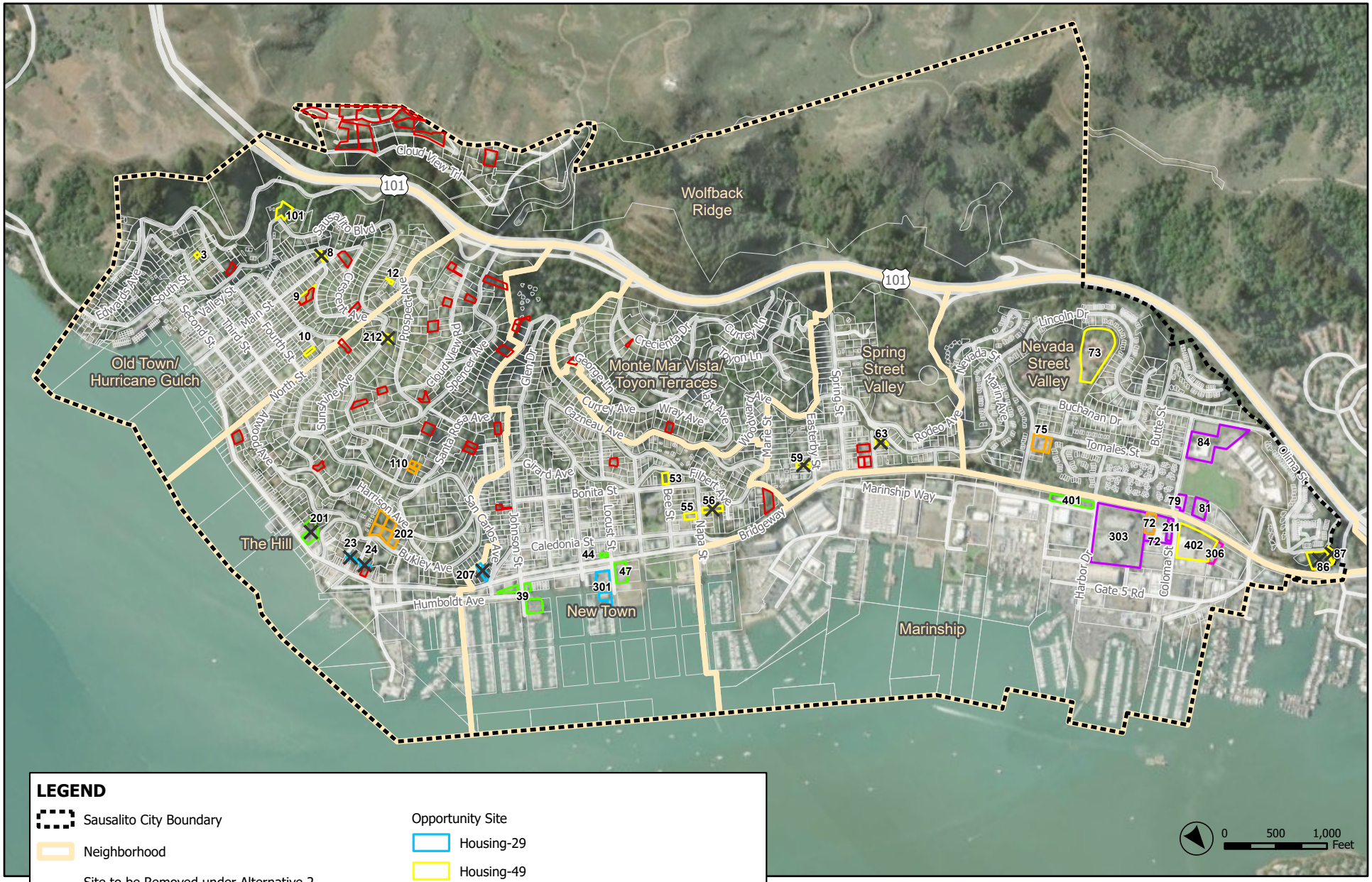
DE NOVO PLANNING GROUP
A LAND USE PLANNING, DESIGN, AND ENVIRONMENTAL FIRM



AMENDED HOUSING ELEMENT EIR

Figure 4-3.
Alternative 1b: No Project/Adopted Housing

Sources: City of Sausalito; Marin GeoHub. Map date: July 18, 2023. Site labels added September 29, 2023.



LEGEND

- Sausalito City Boundary
- Neighborhood
- × Site to be Removed under Alternative 2 (Sites 8, 23, 24, 56, 59, 63, 86, 87, 201, 207, 212)

Inventory Site
- Inventory Site

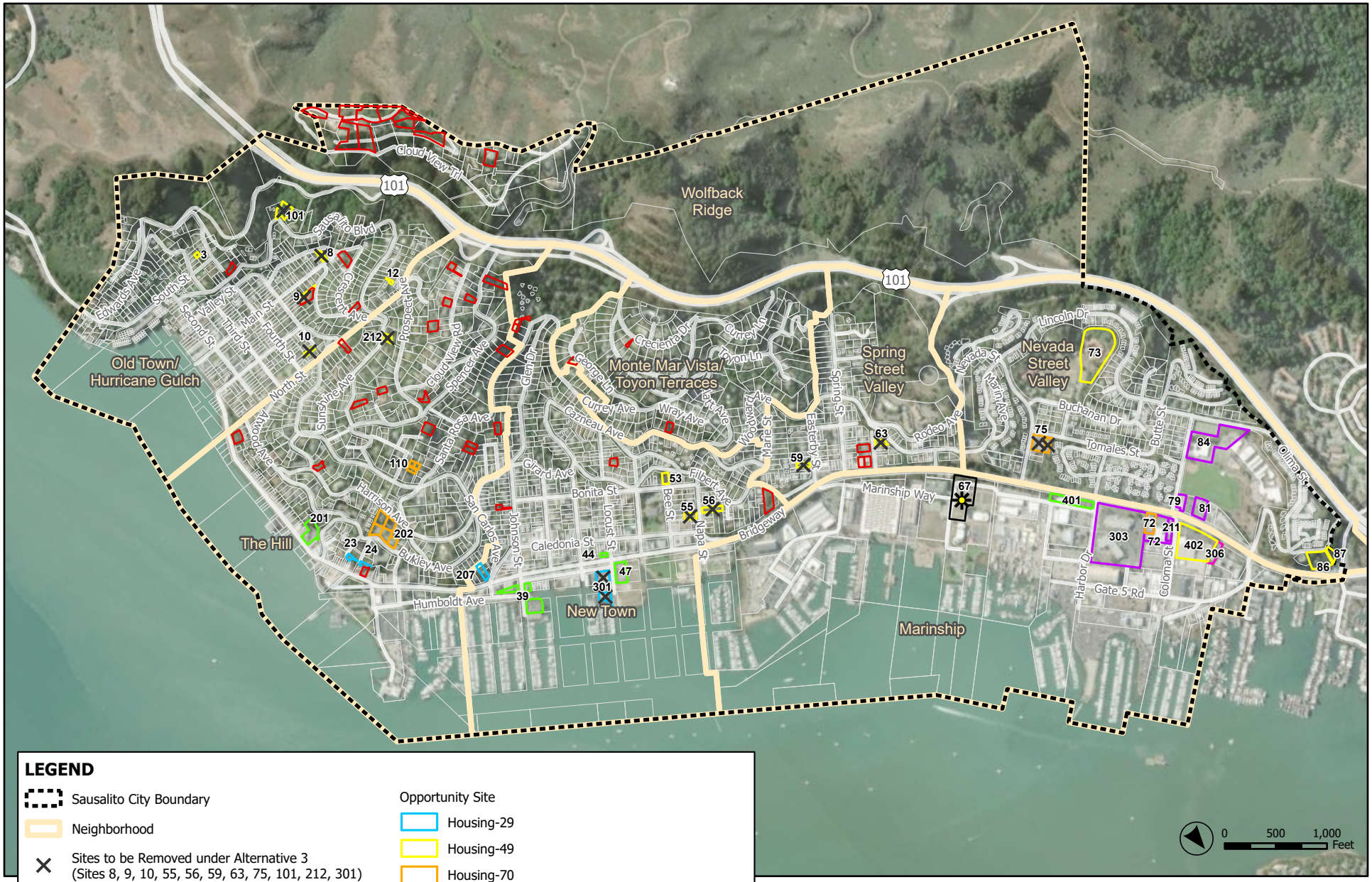
Opportunity Site
- Housing-29
- Housing-49
- Housing-70
- MU-29/85%
- MU-49/85%
- MU-70/85%

CITY OF SAUSALITO AMENDED HOUSING ELEMENT EIR

Figure 4-43.
Alternative 2: Reduced Sites

Sources: City of Sausalito; Marin GeoHub. Map date: August 27, 2024.

DE NOVO PLANNING GROUP
A LAND USE PLANNING, DESIGN, AND ENVIRONMENTAL FIRM



LEGEND

- Sausalito City Boundary
- Neighborhood
- Sites to be Removed under Alternative 3 (Sites 8, 9, 10, 55, 56, 59, 63, 75, 101, 212, 301)
- Site to be Added under Alternative 3 (Site 67)

Inventory Site

- Inventory Site

Opportunity Site

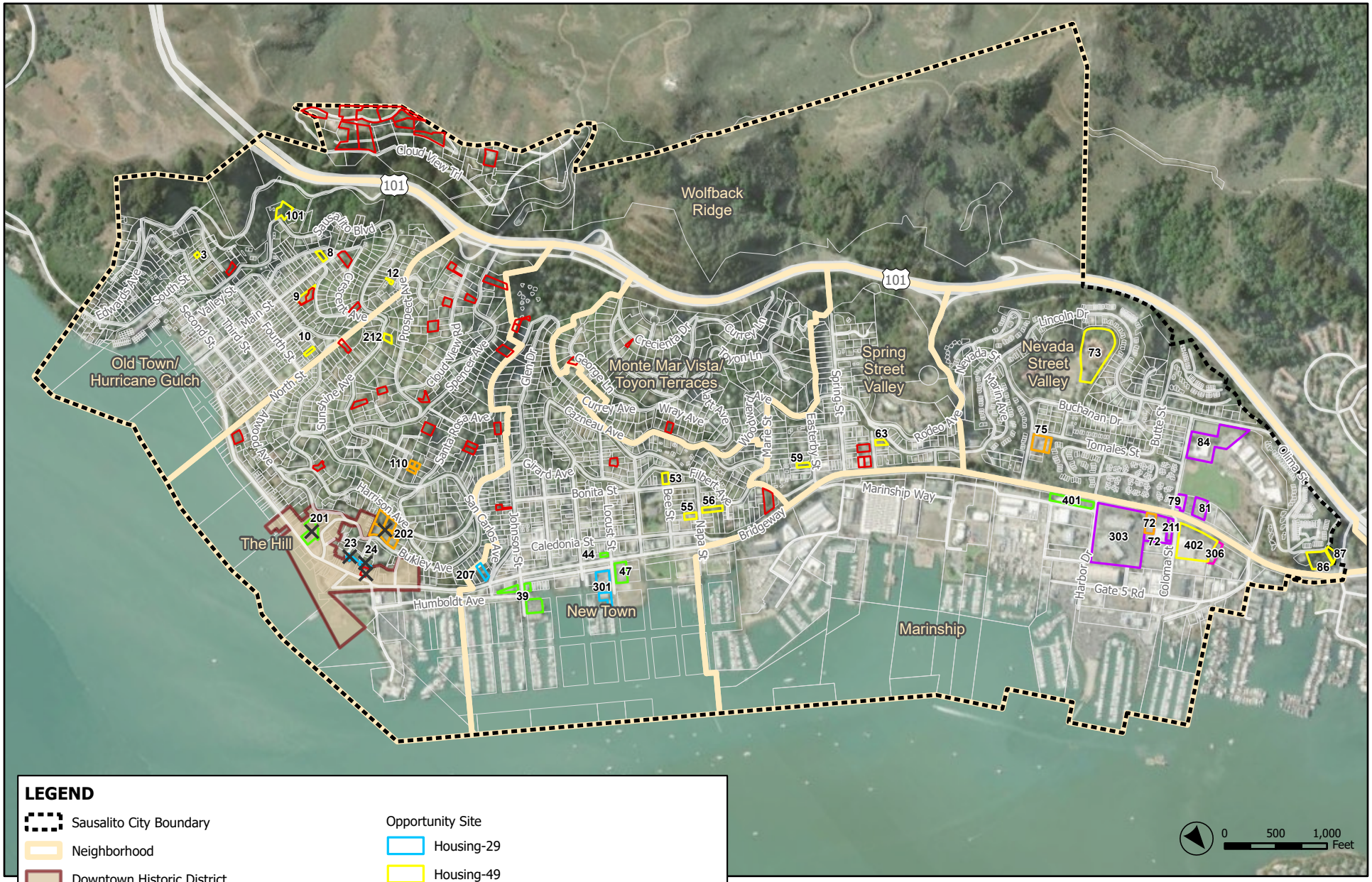
- Housing-29
- Housing-49
- Housing-70
- MU-29/85%
- MU-49/85%
- MU-70/85%
- MU-25/85%

HOUSING ELEMENT PROGRAMS EIR

Figure 4-54.
Alternative 3: Modified Sites

Sources: City of Sausalito; Marin GeoHub. Map date: August 27, 2024.

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm



LEGEND

- Sausalito City Boundary
- Neighborhood
- Downtown Historic District
- Sites to be Removed under Alternative 4 (Sites 23, 24, 201, 202 and one Inventory Site)

Inventory Site

- Inventory Site

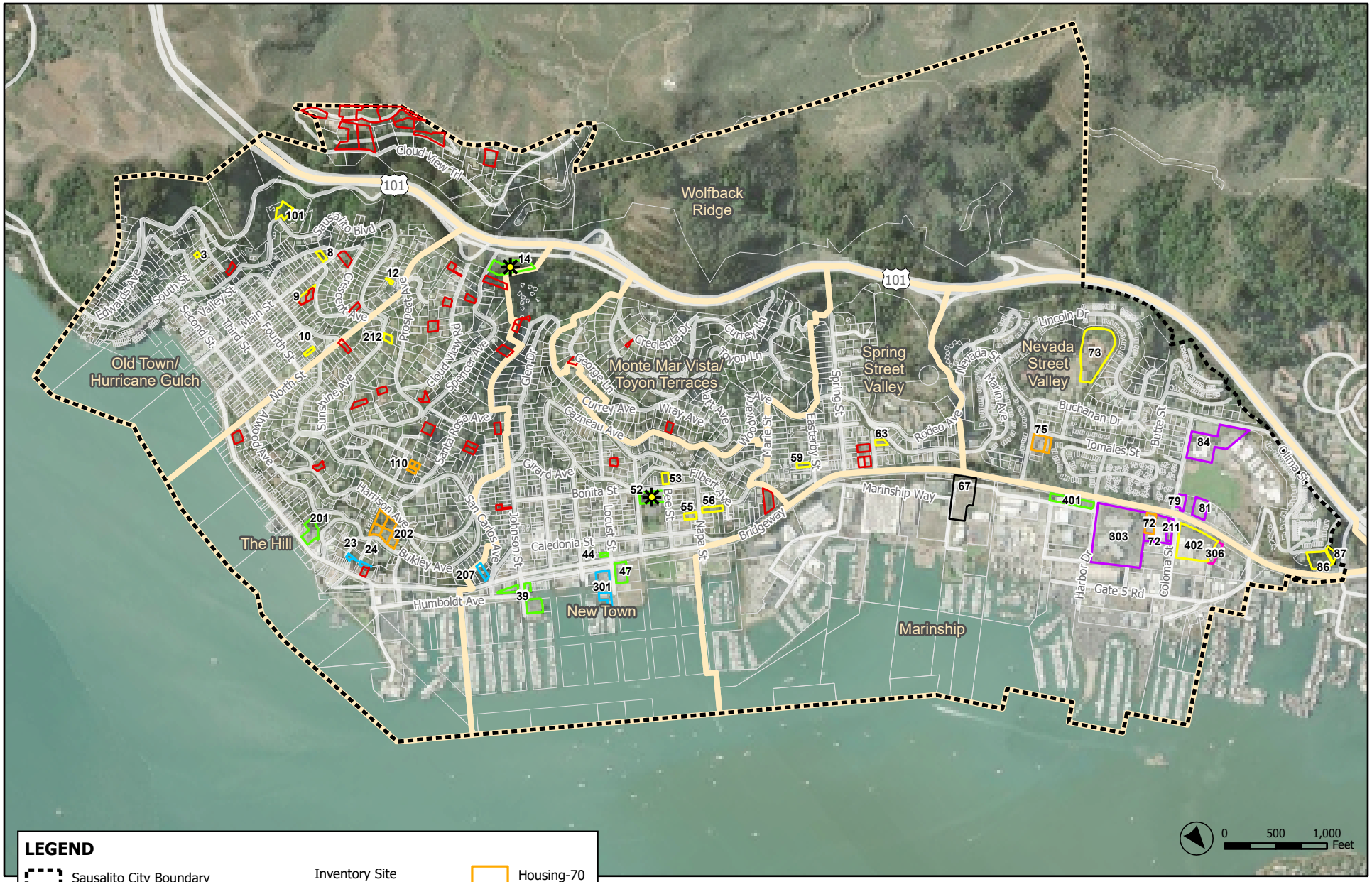
Opportunity Site

- Housing-29
- Housing-49
- Housing-70
- MU-29/85%
- MU-49/85%
- MU-70/85%

HOUSING ELEMENT PROGRAMS EIR

Figure 4-65.
Alternative 4: Historic Preservation

Sources: City of Sausalito; Marin GeoHub. Map date: August 27, 2024.



LEGEND

- Sausalito City Boundary
- Neighborhood
- Sites to be Added under Alternative 5 (Sites 14 and 52) - RHNA Shortfall

Inventory Site

- Inventory Site

Opportunity Site

- Housing-29
- Housing-49
- Housing-70
- MU-29/85%
- MU-49/85%
- MU-70/85%
- MU-25/85%

Sources: City of Sausalito; Marin GeoHub. Map date: November 11, 2024.

AMENDED HOUSING ELEMENT REIR

Figure 4-7. Alternative 5: Modified Project

Revisions to specified pages of Chapter 5.0, Other CEQA Considerations, are identified below.

SECTION 5.0, OTHER CEQA CONSIDERATIONS

Page 5-3, list of Project-Specific Significant and Unavoidable Effects is revised to read:

> ~~**Impact 3.15-2:** Sufficient water supplies may not be available to serve development facilitated by the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.~~

Page 5-3, list of Cumulative Significant and Unavoidable Effects is revised to read:

> **Impact 3.1-6:** Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to aesthetics.
>
> **Impact 3.4-6:** Development facilitated by the Amended Housing Element, in combination with past, present, and reasonably foreseeable projects, ~~would not~~ could result in significant cumulative impacts with respect to historic, cultural, or tribal cultural resources.
>
> **Impact 3.15-6:** Development facilitated by the Project, in combination with past, present, and reasonably foreseeable projects, ~~would not~~ could result in significant cumulative impacts with respect to water supply, wastewater, solid waste, and storm drain facilities (water supply).

APPENDIX B1

Air Quality, Greenhouse Gas, and Energy Calculations
Alternative 5

Alternative 5:

Sausalito Housing Element - RDEIR - Alternative 5 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

3.3. Grading (2025) - Unmitigated

3.5. Building Construction (2025) - Unmitigated

3.7. Building Construction (2026) - Unmitigated

3.9. Building Construction (2027) - Unmitigated

3.11. Building Construction (2028) - Unmitigated

3.13. Building Construction (2029) - Unmitigated

3.15. Building Construction (2030) - Unmitigated

3.17. Paving (2030) - Unmitigated

3.19. Architectural Coating (2030) - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Sausalito Housing Element - RDEIR - Alternative 5
Construction Start Date	1/1/2025
Operational Year	2031
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.90
Precipitation (days)	34.8
Location	37.859257460344125, -122.4861144010782
County	Marin
City	Sausalito
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	904
EDFZ	2
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Condo/Townhouse	1,133	Dwelling Unit	70.8	1,200,980	0.00	0.00	2,719	—

Strip Mall	5.17	1000sqft	0.12	5,171	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	227	227	31.7	45.5	0.06	1.37	19.8	21.2	1.26	10.1	11.4	—	12,681	12,681	0.51	0.76	34.1	12,954
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.73	4.11	29.7	44.6	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	12,404	12,404	0.58	0.78	0.97	12,651
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	47.0	47.0	14.3	29.6	0.03	0.57	5.78	6.35	0.53	2.41	2.94	—	8,745	8,745	0.39	0.55	10.5	8,930
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.59	8.57	2.61	5.40	0.01	0.10	1.06	1.16	0.10	0.44	0.54	—	1,448	1,448	0.06	0.09	1.74	1,478

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2025	4.00	3.37	31.7	30.9	0.06	1.37	19.8	21.2	1.26	10.1	11.4	—	6,771	6,771	0.27	0.06	0.70	6,797
2026	4.61	4.04	16.2	45.5	0.05	0.42	7.64	8.06	0.39	1.82	2.21	—	12,681	12,681	0.51	0.76	34.1	12,954
2027	4.42	3.65	15.5	43.3	0.05	0.38	7.64	8.02	0.35	1.82	2.18	—	12,483	12,483	0.51	0.76	30.8	12,752
2028	4.24	3.50	14.6	41.6	0.05	0.35	7.64	7.98	0.32	1.82	2.14	—	12,279	12,279	0.46	0.52	27.8	12,475
2029	4.08	3.37	14.0	39.9	0.05	0.32	7.64	7.96	0.28	1.82	2.10	—	12,071	12,071	0.46	0.52	24.9	12,264
2030	227	227	6.30	10.3	0.01	0.22	1.35	1.36	0.20	0.32	0.33	—	1,629	1,629	0.06	0.01	3.41	1,635
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	4.73	4.11	29.7	44.6	0.06	1.23	9.37	10.6	1.14	3.69	4.83	—	12,404	12,404	0.58	0.78	0.97	12,651
2026	4.51	3.69	17.0	42.4	0.05	0.42	7.64	8.06	0.39	1.82	2.21	—	12,217	12,217	0.54	0.78	0.88	12,462
2027	4.33	3.56	16.1	40.5	0.05	0.38	7.64	8.02	0.35	1.82	2.18	—	12,027	12,027	0.54	0.78	0.80	12,272
2028	4.17	3.41	15.3	39.0	0.05	0.35	7.64	7.98	0.32	1.82	2.14	—	11,832	11,832	0.50	0.74	0.72	12,064
2029	4.02	3.31	14.5	37.4	0.05	0.32	7.64	7.96	0.28	1.82	2.10	—	11,632	11,632	0.50	0.74	0.65	11,864
2030	3.62	3.15	13.8	36.0	0.05	0.28	7.64	7.92	0.26	1.82	2.08	—	11,431	11,431	0.46	0.71	0.57	11,655
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.10	1.78	14.3	16.7	0.03	0.57	5.78	6.35	0.53	2.41	2.94	—	3,947	3,947	0.17	0.11	1.82	3,984
2026	3.20	2.63	11.9	29.6	0.03	0.30	5.34	5.64	0.28	1.27	1.55	—	8,745	8,745	0.39	0.55	10.5	8,930
2027	3.07	2.52	11.4	28.4	0.03	0.27	5.34	5.61	0.25	1.27	1.52	—	8,609	8,609	0.37	0.54	9.51	8,789
2028	2.97	2.43	10.7	27.4	0.03	0.25	5.35	5.60	0.23	1.27	1.50	—	8,493	8,493	0.36	0.53	8.59	8,667
2029	2.85	2.34	10.3	26.2	0.03	0.23	5.34	5.57	0.20	1.27	1.47	—	8,326	8,326	0.34	0.53	7.68	8,499
2030	47.0	47.0	2.60	5.92	0.01	0.07	0.88	0.95	0.06	0.21	0.27	—	1,506	1,506	0.05	0.04	1.08	1,521
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.38	0.33	2.61	3.05	0.01	0.10	1.06	1.16	0.10	0.44	0.54	—	653	653	0.03	0.02	0.30	660
2026	0.58	0.48	2.17	5.40	0.01	0.06	0.97	1.03	0.05	0.23	0.28	—	1,448	1,448	0.06	0.09	1.74	1,478
2027	0.56	0.46	2.08	5.19	0.01	0.05	0.97	1.02	0.05	0.23	0.28	—	1,425	1,425	0.06	0.09	1.58	1,455
2028	0.54	0.44	1.96	4.99	0.01	0.05	0.98	1.02	0.04	0.23	0.27	—	1,406	1,406	0.06	0.09	1.42	1,435
2029	0.52	0.43	1.88	4.77	0.01	0.04	0.97	1.02	0.04	0.23	0.27	—	1,379	1,379	0.06	0.09	1.27	1,407

2030	8.59	8.57	0.47	1.08	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	249	249	0.01	0.01	0.18	252

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	54.9	51.8	26.5	305	0.69	0.97	65.9	66.9	0.94	16.7	17.6	521	77,781	78,302	55.8	2.41	147	80,562
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	48.2	45.4	29.2	227	0.66	0.94	65.9	66.9	0.92	16.7	17.6	521	74,015	74,536	56.1	2.64	12.2	76,738
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	47.7	45.0	26.2	230	0.60	0.92	57.7	58.7	0.90	14.6	15.5	521	67,858	68,379	55.7	2.32	62.1	70,525
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.70	8.20	4.78	41.9	0.11	0.17	10.5	10.7	0.16	2.67	2.83	86.2	11,235	11,321	9.22	0.38	10.3	11,676

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	30.6	28.2	18.5	237	0.64	0.34	65.9	66.3	0.32	16.7	17.0	—	65,407	65,407	2.29	2.18	138	66,251
Area	23.5	23.1	0.60	64.8	< 0.005	0.03	—	0.03	0.02	—	0.02	0.00	173	173	0.01	< 0.005	—	173
Energy	0.87	0.43	7.43	3.17	0.05	0.60	—	0.60	0.60	—	0.60	—	12,075	12,075	1.26	0.07	—	12,128
Water	—	—	—	—	—	—	—	—	—	—	—	66.3	125	192	6.82	0.16	—	411

Waste	—	—	—	—	—	—	—	—	—	—	—	454	0.00	454	45.4	0.00	—	1,590
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.63	8.63
Total	54.9	51.8	26.5	305	0.69	0.97	65.9	66.9	0.94	16.7	17.6	521	77,781	78,302	55.8	2.41	147	80,562
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	29.8	27.4	21.8	224	0.61	0.34	65.9	66.3	0.32	16.7	17.0	—	61,815	61,815	2.55	2.41	3.58	62,600
Area	17.6	17.6	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.87	0.43	7.43	3.17	0.05	0.60	—	0.60	0.60	—	0.60	—	12,075	12,075	1.26	0.07	—	12,128
Water	—	—	—	—	—	—	—	—	—	—	—	66.3	125	192	6.82	0.16	—	411
Waste	—	—	—	—	—	—	—	—	—	—	—	454	0.00	454	45.4	0.00	—	1,590
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.63	8.63
Total	48.2	45.4	29.2	227	0.66	0.94	65.9	66.9	0.92	16.7	17.6	521	74,015	74,536	56.1	2.64	12.2	76,738
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	26.3	24.2	18.5	195	0.55	0.30	57.7	58.0	0.28	14.6	14.9	—	55,572	55,572	2.19	2.09	53.5	56,302
Area	20.5	20.3	0.30	31.9	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	85.2	85.2	< 0.005	< 0.005	—	85.5
Energy	0.87	0.43	7.43	3.17	0.05	0.60	—	0.60	0.60	—	0.60	—	12,075	12,075	1.26	0.07	—	12,128
Water	—	—	—	—	—	—	—	—	—	—	—	66.3	125	192	6.82	0.16	—	411
Waste	—	—	—	—	—	—	—	—	—	—	—	454	0.00	454	45.4	0.00	—	1,590
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.63	8.63
Total	47.7	45.0	26.2	230	0.60	0.92	57.7	58.7	0.90	14.6	15.5	521	67,858	68,379	55.7	2.32	62.1	70,525
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.81	4.42	3.37	35.5	0.10	0.06	10.5	10.6	0.05	2.67	2.72	—	9,201	9,201	0.36	0.35	8.85	9,322
Area	3.74	3.71	0.05	5.83	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	14.1	14.1	< 0.005	< 0.005	—	14.2
Energy	0.16	0.08	1.36	0.58	0.01	0.11	—	0.11	0.11	—	0.11	—	1,999	1,999	0.21	0.01	—	2,008
Water	—	—	—	—	—	—	—	—	—	—	—	11.0	20.7	31.7	1.13	0.03	—	68.1
Waste	—	—	—	—	—	—	—	—	—	—	—	75.2	0.00	75.2	7.52	0.00	—	263
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.43	1.43

Total	8.70	8.20	4.78	41.9	0.11	0.17	10.5	10.7	0.16	2.67	2.83	86.2	11,235	11,321	9.22	0.38	10.3	11,676

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.94	3.31	31.6	30.2	0.05	1.37	—	1.37	1.26	—	1.26	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43	0.36	3.47	3.31	0.01	0.15	—	0.15	0.14	—	0.14	—	580	580	0.02	< 0.005	—	582
Dust From Material Movement	—	—	—	—	—	—	2.15	2.15	—	1.11	1.11	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.63	0.60	< 0.005	0.03	—	0.03	0.03	—	0.03	—	96.1	96.1	< 0.005	< 0.005	—	96.4
Dust From Material Movement	—	—	—	—	—	—	0.39	0.39	—	0.20	0.20	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.68	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	151	151	< 0.005	0.01	0.61	153
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	15.5	15.5	< 0.005	< 0.005	0.03	15.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.56	2.56	< 0.005	< 0.005	< 0.005	2.60
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.80	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.80	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.96	8.94	8.53	0.02	0.37	—	0.37	0.34	—	0.34	—	1,989	1,989	0.08	0.02	—	1,996

Dust From Material Movement	—	—	—	—	—	—	2.77	2.77	—	1.10	1.10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.18	1.63	1.56	< 0.005	0.07	—	0.07	0.06	—	0.06	—	329	329	0.01	< 0.005	—	330
Dust From Material Movement	—	—	—	—	—	—	0.51	0.51	—	0.20	0.20	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.78	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	172	172	< 0.005	0.01	0.70	175
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.70	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	161	161	< 0.005	0.01	0.02	163
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.20	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	48.7	48.7	< 0.005	< 0.005	0.09	49.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.06	8.06	< 0.005	< 0.005	0.02	8.18
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.10	1.38	< 0.005	0.05	—	0.05	0.04	—	0.04	—	253	253	0.01	< 0.005	—	254
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.03	0.02	0.20	0.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	41.9	41.9	< 0.005	< 0.005	—	42.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.94	2.85	2.56	28.7	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,573	6,573	0.18	0.28	0.74	6,662
Vendor	0.44	0.13	5.12	2.88	0.02	0.05	0.88	0.93	0.05	0.24	0.28	—	3,433	3,433	0.30	0.48	0.23	3,583
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.30	0.24	2.93	0.00	0.00	0.70	0.70	0.00	0.16	0.16	—	697	697	0.02	0.03	1.30	708
Vendor	0.05	0.01	0.53	0.30	< 0.005	< 0.005	0.09	0.10	< 0.005	0.02	0.03	—	363	363	0.03	0.05	0.40	379
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.04	0.53	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	115	115	< 0.005	< 0.005	0.22	117
Vendor	0.01	< 0.005	0.10	0.06	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	60.1	60.1	0.01	0.01	0.07	62.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.77	7.04	9.26	0.02	0.27	—	0.27	0.25	—	0.25	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	1.28	1.69	< 0.005	0.05	—	0.05	0.05	—	0.05	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	2.89	2.84	1.77	29.8	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,916	6,916	0.13	0.26	26.1	7,024
Vendor	0.44	0.13	4.61	2.70	0.02	0.05	0.88	0.93	0.05	0.24	0.28	—	3,368	3,368	0.28	0.47	8.01	3,525
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.80	2.50	2.32	26.7	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,450	6,450	0.16	0.28	0.68	6,539
Vendor	0.43	0.12	4.85	2.75	0.02	0.05	0.88	0.93	0.05	0.24	0.28	—	3,369	3,369	0.28	0.47	0.21	3,517
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.97	1.77	1.47	18.4	0.00	0.00	4.72	4.72	0.00	1.10	1.10	—	4,626	4,626	0.12	0.20	8.03	4,698
Vendor	0.31	0.09	3.41	1.95	0.02	0.03	0.62	0.65	0.03	0.17	0.20	—	2,406	2,406	0.20	0.34	2.47	2,514
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.36	0.32	0.27	3.36	0.00	0.00	0.86	0.86	0.00	0.20	0.20	—	766	766	0.02	0.03	1.33	778
Vendor	0.06	0.02	0.62	0.36	< 0.005	0.01	0.11	0.12	0.01	0.03	0.04	—	398	398	0.03	0.06	0.41	416
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.71	9.24	0.02	0.24	—	0.24	0.22	—	0.22	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.22	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.78	2.50	1.75	27.8	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,789	6,789	0.13	0.26	23.7	6,895
Vendor	0.41	0.12	4.37	2.59	0.02	0.05	0.88	0.93	0.05	0.24	0.28	—	3,296	3,296	0.28	0.47	7.17	3,451
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	2.69	2.41	2.07	24.9	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,333	6,333	0.16	0.28	0.62	6,422
Vendor	0.40	0.12	4.61	2.64	0.02	0.05	0.88	0.93	0.05	0.24	0.28	—	3,297	3,297	0.28	0.47	0.19	3,445
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.90	1.70	1.45	17.3	0.00	0.00	4.72	4.72	0.00	1.10	1.10	—	4,542	4,542	0.10	0.19	7.30	4,608
Vendor	0.29	0.09	3.23	1.86	0.02	0.03	0.62	0.65	0.03	0.17	0.20	—	2,355	2,355	0.20	0.34	2.21	2,463
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.35	0.31	0.27	3.16	0.00	0.00	0.86	0.86	0.00	0.20	0.20	—	752	752	0.02	0.03	1.21	763
Vendor	0.05	0.02	0.59	0.34	< 0.005	0.01	0.11	0.12	0.01	0.03	0.04	—	390	390	0.03	0.06	0.37	408
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.39	9.26	0.02	0.22	—	0.22	0.20	—	0.20	—	1,717	1,717	0.07	0.01	—	1,723
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.17	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.67	2.41	1.52	26.2	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,670	6,670	0.11	0.05	21.4	6,710
Vendor	0.38	0.10	4.14	2.47	0.02	0.05	0.88	0.93	0.05	0.24	0.28	—	3,212	3,212	0.26	0.45	6.40	3,359
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.60	2.32	2.03	23.5	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,222	6,222	0.14	0.26	0.55	6,305
Vendor	0.38	0.10	4.34	2.54	0.02	0.05	0.88	0.93	0.05	0.24	0.28	—	3,213	3,213	0.26	0.45	0.17	3,354
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.85	1.65	1.28	16.3	0.00	0.00	4.73	4.73	0.00	1.11	1.11	—	4,475	4,475	0.10	0.19	6.61	4,540
Vendor	0.28	0.07	3.06	1.79	0.02	0.03	0.62	0.65	0.03	0.17	0.20	—	2,301	2,301	0.18	0.32	1.98	2,404
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.34	0.30	0.23	2.98	0.00	0.00	0.86	0.86	0.00	0.20	0.20	—	741	741	0.02	0.03	1.09	752
Vendor	0.05	0.01	0.56	0.33	< 0.005	0.01	0.11	0.12	0.01	0.03	0.04	—	381	381	0.03	0.05	0.33	398
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.82	0.69	6.13	9.22	0.02	0.20	—	0.20	0.18	—	0.18	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.12	1.68	< 0.005	0.04	—	0.04	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.57	2.30	1.49	24.6	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,557	6,557	0.11	0.05	19.2	6,595
Vendor	0.36	0.10	3.91	2.37	0.02	0.05	0.88	0.93	0.02	0.24	0.26	—	3,118	3,118	0.26	0.45	5.68	3,264
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.51	2.25	1.81	22.0	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,116	6,116	0.14	0.26	0.50	6,199
Vendor	0.35	0.09	4.11	2.43	0.02	0.05	0.88	0.93	0.02	0.24	0.26	—	3,119	3,119	0.25	0.45	0.15	3,260
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.77	1.58	1.26	15.2	0.00	0.00	4.72	4.72	0.00	1.10	1.10	—	4,387	4,387	0.09	0.19	5.92	4,451
Vendor	0.25	0.07	2.88	1.72	0.02	0.03	0.62	0.65	0.02	0.17	0.18	—	2,227	2,227	0.18	0.32	1.75	2,330
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.32	0.29	0.23	2.78	0.00	0.00	0.86	0.86	0.00	0.20	0.20	—	726	726	0.01	0.03	0.98	737
Vendor	0.05	0.01	0.53	0.31	< 0.005	0.01	0.11	0.12	< 0.005	0.03	0.03	—	369	369	0.03	0.05	0.29	386
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Building Construction (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.12	0.94	8.39	12.9	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.66	1.01	< 0.005	0.02	—	0.02	0.02	—	0.02	—	188	188	0.01	< 0.005	—	188
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31.1	31.1	< 0.005	< 0.005	—	31.2

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.18	2.12	1.58	20.7	0.00	0.00	6.76	6.76	0.00	1.58	1.58	—	6,016	6,016	0.13	0.26	0.44	6,099
Vendor	0.33	0.09	3.88	2.33	0.02	0.02	0.88	0.90	0.02	0.24	0.26	—	3,018	3,018	0.23	0.43	0.13	3,151
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.16	0.12	1.57	0.00	0.00	0.52	0.52	0.00	0.12	0.12	—	473	473	0.01	< 0.005	0.58	475
Vendor	0.03	0.01	0.30	0.18	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	236	236	0.02	0.03	0.17	247
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.29	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	78.3	78.3	< 0.005	< 0.005	0.10	78.6
Vendor	< 0.005	< 0.005	0.05	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	39.1	39.1	< 0.005	0.01	0.03	40.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Paving (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.77	0.64	6.28	9.90	0.01	0.22	—	0.22	0.20	—	0.20	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.77	0.64	6.28	9.90	0.01	0.22	—	0.22	0.20	—	0.20	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.29	2.03	< 0.005	0.05	—	0.05	0.04	—	0.04	—	310	310	0.01	< 0.005	—	311
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.24	0.37	< 0.005	0.01	—	0.01	0.01	—	0.01	—	51.4	51.4	< 0.005	< 0.005	—	51.6
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.02	0.43	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	118	118	< 0.005	< 0.005	0.31	119
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.38	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	110	110	< 0.005	< 0.005	0.01	112
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	22.8	22.8	< 0.005	< 0.005	0.03	22.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.77	3.77	< 0.005	< 0.005	< 0.005	3.79
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.19. Architectural Coating (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.12	0.10	0.78	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	226	226	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.23	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	27.4	27.4	< 0.005	< 0.005	—	27.5
Architectural Coatings	46.5	46.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.54	4.54	< 0.005	< 0.005	—	4.56
Architectural Coatings	8.48	8.48	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.45	0.44	0.25	4.66	0.00	0.00	1.35	1.35	0.00	0.32	0.32	—	1,290	1,290	0.02	0.01	3.41	1,297
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	0.06	0.83	0.00	0.00	0.27	0.27	0.00	0.06	0.06	—	248	248	0.01	< 0.005	0.30	249
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.15	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	41.1	41.1	< 0.005	< 0.005	0.05	41.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Condo/Townhouse	29.7	27.5	17.9	229	0.62	0.33	63.8	64.1	0.31	16.1	16.5	—	63,294	63,294	2.23	2.11	134	64,112
Strip Mall	0.81	0.74	0.56	7.34	0.02	0.01	2.14	2.15	0.01	0.54	0.55	—	2,113	2,113	0.07	0.07	4.49	2,139
Total	30.6	28.2	18.5	237	0.64	0.34	65.9	66.3	0.32	16.7	17.0	—	65,407	65,407	2.29	2.18	138	66,251
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	29.0	26.7	21.2	218	0.59	0.33	63.8	64.1	0.31	16.1	16.5	—	59,819	59,819	2.48	2.34	3.47	60,581
Strip Mall	0.79	0.72	0.66	6.77	0.02	0.01	2.14	2.15	0.01	0.54	0.55	—	1,996	1,996	0.07	0.07	0.12	2,020
Total	29.8	27.4	21.8	224	0.61	0.34	65.9	66.3	0.32	16.7	17.0	—	61,815	61,815	2.55	2.41	3.58	62,600
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	4.68	4.30	3.27	34.4	0.10	0.05	10.2	10.2	0.05	2.58	2.63	—	8,897	8,897	0.35	0.33	8.56	9,014
Strip Mall	0.13	0.12	0.10	1.10	< 0.005	< 0.005	0.35	0.35	< 0.005	0.09	0.09	—	304	304	0.01	0.01	0.29	307
Total	4.81	4.42	3.37	35.5	0.10	0.06	10.5	10.6	0.05	2.67	2.72	—	9,201	9,201	0.36	0.35	8.85	9,322

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	2,620	2,620	0.42	0.05	—	2,646
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	24.1	24.1	< 0.005	< 0.005	—	24.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,645	2,645	0.43	0.05	—	2,671
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	2,620	2,620	0.42	0.05	—	2,646
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	24.1	24.1	< 0.005	< 0.005	—	24.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,645	2,645	0.43	0.05	—	2,671
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	434	434	0.07	0.01	—	438
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	3.99	3.99	< 0.005	< 0.005	—	4.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	438	438	0.07	0.01	—	442

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	0.87	0.43	7.42	3.16	0.05	0.60	—	0.60	0.60	—	0.60	—	9,420	9,420	0.83	0.02	—	9,446

Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.6	10.6	< 0.005	< 0.005	—	10.7
Total	0.87	0.43	7.43	3.17	0.05	0.60	—	0.60	0.60	—	0.60	—	9,431	9,431	0.83	0.02	—	9,457
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	0.87	0.43	7.42	3.16	0.05	0.60	—	0.60	0.60	—	0.60	—	9,420	9,420	0.83	0.02	—	9,446
Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.6	10.6	< 0.005	< 0.005	—	10.7
Total	0.87	0.43	7.43	3.17	0.05	0.60	—	0.60	0.60	—	0.60	—	9,431	9,431	0.83	0.02	—	9,457
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	0.16	0.08	1.35	0.58	0.01	0.11	—	0.11	0.11	—	0.11	—	1,560	1,560	0.14	< 0.005	—	1,564
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.76	1.76	< 0.005	< 0.005	—	1.77
Total	0.16	0.08	1.36	0.58	0.01	0.11	—	0.11	0.11	—	0.11	—	1,561	1,561	0.14	< 0.005	—	1,566

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	12.9	12.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	4.65	4.65	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	5.91	5.59	0.60	64.8	< 0.005	0.03	—	0.03	0.02	—	0.02	—	173	173	0.01	< 0.005	—	173
Total	23.5	23.1	0.60	64.8	< 0.005	0.03	—	0.03	0.02	—	0.02	0.00	173	173	0.01	< 0.005	—	173
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	12.9	12.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	4.65	4.65	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	17.6	17.6	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	2.36	2.36	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.85	0.85	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.53	0.50	0.05	5.83	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.1	14.1	< 0.005	< 0.005	—	14.2
Total	3.74	3.71	0.05	5.83	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	14.1	14.1	< 0.005	< 0.005	—	14.2

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	65.6	124	190	6.75	0.16	—	407
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.73	1.39	2.12	0.08	< 0.005	—	4.55
Total	—	—	—	—	—	—	—	—	—	—	—	66.3	125	192	6.82	0.16	—	411
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	65.6	124	190	6.75	0.16	—	407
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.73	1.39	2.12	0.08	< 0.005	—	4.55
Total	—	—	—	—	—	—	—	—	—	—	—	66.3	125	192	6.82	0.16	—	411
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	10.9	20.5	31.4	1.12	0.03	—	67.3
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.12	0.23	0.35	0.01	< 0.005	—	0.75
Total	—	—	—	—	—	—	—	—	—	—	—	11.0	20.7	31.7	1.13	0.03	—	68.1

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	452	0.00	452	45.1	0.00	—	1,580
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	2.93	0.00	2.93	0.29	0.00	—	10.2
Total	—	—	—	—	—	—	—	—	—	—	—	454	0.00	454	45.4	0.00	—	1,590
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	452	0.00	452	45.1	0.00	—	1,580
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	2.93	0.00	2.93	0.29	0.00	—	10.2
Total	—	—	—	—	—	—	—	—	—	—	—	454	0.00	454	45.4	0.00	—	1,590
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	74.8	0.00	74.8	7.47	0.00	—	262
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.48	0.00	0.48	0.05	0.00	—	1.69
Total	—	—	—	—	—	—	—	—	—	—	—	75.2	0.00	75.2	7.52	0.00	—	263

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.60	8.60
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.63	8.63
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.60	8.60
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.63	8.63
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.42	1.42
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.43	1.43

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	4/10/2025	6/5/2025	5.00	40.0	—
Grading	Grading	6/6/2025	11/7/2025	5.00	110	—
Building Construction	Building Construction	11/8/2025	2/9/2030	5.00	1,110	—

Paving	Paving	2/10/2030	5/26/2030	5.00	75.0	—
Architectural Coating	Architectural Coating	5/27/2030	9/9/2030	5.00	75.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	817	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	122	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	163	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	2,431,985	810,662	7,757	2,586	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Ton of Debris)	Material Exported (Ton of Debris)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	60.0	0.00	—
Grading	0.00	0.00	330	0.00	—
Paving	0.00	0.00	0.00	0.00	0.00

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Condo/Townhouse	—	0%
Strip Mall	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	204	0.03	< 0.005
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005
2029	0.00	204	0.03	< 0.005
2030	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Condo/Townhouse	8,294	9,223	7,115	3,014,152	81,563	90,699	69,974	29,642,532
Strip Mall	229	217	106	76,594	3,045	2,889	1,404	1,017,788

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Condo/Townhouse	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	1139
Conventional Wood Stoves	0

Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
2431984.5	810,662	7,757	2,586	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Condo/Townhouse	4,688,966	204	0.0330	0.0040	29,393,482
Strip Mall	43,169	204	0.0330	0.0040	33,227

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Condo/Townhouse	34,241,526	0.00
Strip Mall	383,029	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Condo/Townhouse	838	—
Strip Mall	5.43	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	7.19	annual days of extreme heat
Extreme Precipitation	8.75	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	6.01	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	3	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	3	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	3.83
AQ-PM	25.3
AQ-DPM	59.8
Drinking Water	7.43
Lead Risk Housing	32.8
Pesticides	0.00
Toxic Releases	58.5
Traffic	98.4
Effect Indicators	—
CleanUp Sites	78.0
Groundwater	44.3
Haz Waste Facilities/Generators	72.6
Impaired Water Bodies	90.1
Solid Waste	52.9
Sensitive Population	—
Asthma	32.0
Cardio-vascular	22.9
Low Birth Weights	11.2
Socioeconomic Factor Indicators	—
Education	2.71
Housing	33.7
Linguistic	12.3
Poverty	17.2
Unemployment	9.72

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	89.33658411
Employed	99.0632619
Median HI	90.77377133
Education	—
Bachelor's or higher	96.99730527
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	42.10188631
Active commuting	90.46580264
Social	—
2-parent households	89.58039266
Voting	98.20351598
Neighborhood	—
Alcohol availability	12.98601309
Park access	81.35506224
Retail density	90.87642756
Supermarket access	72.34697806
Tree canopy	96.61234441
Housing	—
Homeownership	37.0973951
Housing habitability	60.43885538
Low-inc homeowner severe housing cost burden	54.20248941
Low-inc renter severe housing cost burden	66.84203773
Uncrowded housing	89.4649044
Health Outcomes	—

Insured adults	87.48877197
Arthritis	0.0
Asthma ER Admissions	59.1
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	92.9
Cognitively Disabled	92.5
Physically Disabled	86.7
Heart Attack ER Admissions	87.9
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	76.1
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.2
SLR Inundation Area	26.0
Children	78.7
Elderly	8.7

English Speaking	75.0
Foreign-born	21.6
Outdoor Workers	89.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	63.0
Traffic Density	81.2
Traffic Access	52.9
Other Indices	—
Hardship	2.2
Other Decision Support	—
2016 Voting	97.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	15.0
Healthy Places Index Score for Project Location (b)	99.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	No demolition.
Operations: Hearths	No hearths
Operations: Consumer Products	Revised General Category consumer products emissions factor to reflect CARB adjustments applied to their Consumer and Commercial Product Survey Emission data, made after the 2008 consumer products emissions factor. Adjustment made to reflect average adjustment factor. See for further detail: https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-emissio