Indian Valley Campus
Facilities Improvements Project

Initial Study and
Proposed Mitigated Negative Declaration

The following Initial Study has been prepared in compliance with the
California Environmental Quality Act.

Prepared For:

College of Marin
835 College Avenue
Kentfield, CA 94904
(415) 884-3101
Contact: Greg Nelson

Prepared By:

Impact Sciences, Inc.
505 14th Street, Suite 1230
Oakland, California 94612
(510) 267-0494
Contact: Paul Stephenson

September 2017

TABLE OF CONTENTS

Section		Page
Introduction		1
I.	Project Information	3
II.	Project Location and Description	4
III.	Environmental Factors Potentially Affected	15
IV.	Determination	16
V.	Evaluation of Environmental Impacts	17
VI.	Supporting Information Sources	74
VII.	Initial Study Preparers	76

Appendices

A	Proposed Mitigated Negative Declaration
B	California Emissions Estimator Model Results
C	Biological Resources Assessment

LIST OF FIGURES

Figure		Page
1	Regional and Site Location	7
2	Aerial View – Indian Valley Campus	8
3	Aerial View - Outdoor Amphitheater Site	9
4	Proposed Site Plan - Outdoor Amphitheater	10
5	Aerial View - Organic Farm Improvements Site	11
6	Proposed Site Plan - Parking Lot No. 6	9
7	Proposed Site Plan - Organic Farm Classroom Complex	13
8	Aerial View – Ohlone Cluster Site	14

LIST OF TABLES

Table		Page
1	Estimated Construction Emissions	24
2	Construction Equipment Noise Emission Levels	58

INTRODUCTION

Initial Study

Pursuant to Section 15063 of the *California Environmental Quality Act (CEQA) Guidelines* (Title 14, California Code of Regulations, Sections 15000 et seq.), an Initial Study is a preliminary environmental analysis that is used by the lead agency (the public agency principally responsible for approving or carrying out the proposed project) as a basis for determining whether an Environmental Impact Report, a Mitigated Negative Declaration, or a Negative Declaration is required for a project. The *State CEQA Guidelines* require that an Initial Study contain a project description, description of environmental setting, identification of environmental effects by checklist or other similar form, explanation of environmental effects, discussion of mitigation for significant environmental effects, evaluation of the project's consistency with existing, applicable land use controls, and the name of persons who prepared the study.

The purpose of this Initial Study is to evaluate the potential environmental impacts of the proposed Indian Valley Campus Facilities Improvements Project ("proposed project") to determine what level of additional environmental review, if any, is appropriate. As shown in the Determination in Section IV of this document, and based on the analysis contained in this Initial Study, it has been determined that the proposed project would not result in any significant impacts that cannot be mitigated to less than significant levels. The analysis contained in this Initial Study concludes that the proposed project would result in the following categories of impacts, depending on the environmental resource involved: no impact; less than significant impact; or less than significant impact with the implementation of project-specific mitigation measures. Therefore, preparation of a Mitigated Negative Declaration is appropriate (the Proposed Mitigated Negative Declaration is presented in **Appendix A**).

Public and Agency Review

This Initial Study/Proposed Mitigated Negative Declaration will be circulated for public and agency review from September 13, 2017 to October 12, 2017. Copies of this document are available for review at the College of Marin Indian Valley Campus Library, 800 Ignacio Blvd, Novato, California, and on the College's website at http://www1.marin.edu. Comments on this Initial Study/Proposed Mitigated Negative Declaration must be received by 5:00 PM on October 12, 2017 and can be sent or emailed to:

Greg Nelson
Vice President for Finance & College Operations
College of Marin
835 College Avenue
Kentfield, CA 94904
GNelson@marin.edu

Organization of the Initial Study

This Initial Study is organized into the following sections.

Section I – Project Information: provides summary background information about the proposed project, including project location, lead agency, and contact information.

Section II – Project Location and Description: includes a description of the proposed project, including the need for the project, the project's objectives, and the elements included in the project.

Section III – Environmental Factors Potentially Affected: identifies what environmental resources, if any, would involve at least one significant or potentially significant impact that cannot be reduced to a less than significant level.

Section IV – Determination: indicates whether impacts associated with the proposed project would be significant, and what, if any, additional environmental documentation is required.

Section V – Evaluation of Environmental Impacts: contains the Environmental Checklist form for each resource and presents an explanation of all checklist answers. The checklist is used to assist in evaluating the potential environmental impacts of the proposed project and determining which impacts, if any, need to be further evaluated in an EIR.

Section VI – Supporting Information Sources: lists references used in the preparation of this document.

Section VII – Initial Study Preparers: lists the names of individuals involved in the preparation of this document.

Appendices: Technical studies used in the preparation of this Initial Study.

I. PROJECT INFORMATION

1. Project title:

   Indian Valley Campus Facilities Improvements Project

2. Lead agency name and address:

   College of Marin
   835 College Avenue
   Kentfield, CA 94904

3. Contact person and phone number:

   Greg Nelson
   Vice President for Finance & College Operations
   (415) 884-3101

4. Project location:

   1800 Ignacio Boulevard, Novato, CA 94949

5. Project sponsor's name and address:

   Same as Lead Agency

6. City of Novato General Plan Designation:

   Community Facility

7. City of Novato Zoning:

   Community Facility

II. PROJECT LOCATION AND DESCRIPTION

1. Description of Project:

Location: The Indian Valley Campus is located in the southwestern portion of Novato in northern Marin County. The location of the campus within Marin County and the City of Novato is shown in **Figure 1, Regional and Site Location**. The campus is accessed via Ignacio Boulevard, which intersects U.S. Highway 101 to the east. The campus is located at the western terminus of this roadway.

Existing Conditions: The Indian Valley Campus encompasses approximately 333 acres. Of the total acreage, only 87 acres are developed with college facilities. The Indian Valley Campus includes approximately 208,050 gross square feet (gsf) of building space in 27 buildings. In Spring 2015, the campus had an enrollment of approximately 1,150 students (COM 20015). Ignacio Creek forms a major natural feature that flows through the center of the campus. Numerous pedestrian and service vehicular bridges provide access across the creek to the main campus. A majority of the buildings on the campus are located south of the creek while all parking is located to the north of the creek. The buildings on the campus are sited in four clusters that are connected via a pedestrian pathway network. The corporation yard, swimming pool, and sports fields are located in the western part of the campus.

A perimeter road, with restricted access, encircles the majority of campus buildings and other facilities with the exception of the corporation yard, sports fields, and hard courts, which are located west of the Ignacio Boulevard terminus.

The campus has extensive tree coverage. Oak and bay-covered hillsides surround the main campus and form a "bowl" around the western portion of the campus, which serves as the main watershed of Ignacio Creek.

Project Features and Operations: The College of Marin Facilities Master Plan (FMP) 2016-2021 includes a number of improvements for the Indian Valley Campus. The improvements contained in the FMP address current and projected needs on the Indian Valley Campus through 2021 and would serve the existing student population. No substantial increase in student population on campus due to the implementation of the FMP is expected to occur.

The College plans on constructing three of the improvement projects listed in the FMP over the next 12 months. The remaining improvement projects listed in the FMP are not scheduled for implementation at this time and will undergo separate environmental review in the future. The proposed project for purposes of CEQA includes the three improvement projects scheduled for implementation at this time. The location of each of the improvement projects on the campus is provided in **Figure 2, Aerial View – Indian Valley Campus**. A detailed description of each improvement project is provided below:

- **Outdoor Amphitheater** – This improvement project is located in the central portion of the campus north of the Pomo Cluster, south of Ignacio Creek and west of the Administrative Services buildings. The project consists of an outdoor amphitheater and the replacement of adjacent asphalt pathways with poured concrete pathways.

The site of the amphitheater gently slopes from southwest to northeast toward Ignacio Creek. As shown in **Figure 3, Aerial View - Outdoor Amphitheater Site**, groundcover on the site is dominated by non-native grasses and weedy herbaceous species. California bay laurel (*Umbellularia californica*) and coast live oak (*Quercus agrifolia*) trees occur throughout the site, with fewer trees occurring in the southern portion of the site and a denser tree canopy on the northern portion of the site near the creek.

As indicated in **Figure 4, Proposed Site Plan - Outdoor Amphitheater**, the outdoor stage would be located on the northern portion of the site and would face southwest toward a landsaped seating area that would be upslope from the stage. The seating area would have a capacity to seat 455 people. Three 18-inch high stacked block retaining seat walls with concreate stairs in the center would be evenly distributed throughout the landscaped area. A five-foot wide concrete access path to the stage would be located on the northern portion of the site while a concrete mow band would extend from the stage in a southeasterly direction and loop around the site to connect with the improved concrete path to the west. The new amphitheater would be accessible via the upgraded pathways. The proposed amphitheater would not include theatrical lighting. Lighting would be limited to safety lights on the stairs and paths and dimmable lighting built into the structures. Construction would last approximately three to four months depending on weather.

- **Organic Farm Improvements** – This improvement project is located in the northwestern portion of the campus and would be constructed within the boundaries of Parking Lot No. 6, the existing corporation yard, and a portion of the organic farm. The project mainly consists of the renovation of Parking Lot No. 6 and the construction of three one-story classroom buildings to serve the organic farm program. The project also includes the relocation of existing structures to the organic farm site, a new trail, and a new deer fence surrounding the organic farm.

  As shown in **Figure 5, Aerial View – Organic Farm Improvements Site,** an existing structure (Building 22) is located on the western portion of Parking Lot No. 6 while existing strucutres in the corporation yard include a warehouse along the northern boundary and a greenhouse and shade structure along the western boundary. In addition, the portion of the organic farm immediately to the west of the corporation yard that would be affected by the improvements includes trees and vegetation.

  As indicated in **Figure 6, Proposed Site Plan – Parking Lot No. 6,** Building 22 would be demolished and the entire parking lot would be renovated to add more parking. Drainage on the parking lot would be directed to an existing storm water inlet and the renovated parking lot would include 83 parking spaces. As shown in **Figure 7, Proposed Site Plan – Organic Farm Classroom Complex**, the organic farm classroom complex would include three one-story classroom buildings and a multiple purpose lawn/outdoor classroom. Overall the complex would provide approximately 4,800 gross square feet (gsf) of new classroom and demonstration space and would have a capacity for 197 students and staff. Next, the existing shade structure and greenhouses would be relocated to the southern portion of the organic farm approximately 60 feet to the west of the corporation yard. Finally, an approximately 340 foot long trail would be constructed to the south of the organic farm and classroom complex to provide access to county trails to the west, and a 2,740 foot long fence would be constructed

around the organic farm fields to prevent deer from entering the fields. Construction of these improvements would last approximately three to four months depending on weather.

- **Ohlone Cluster Demolition** – As shown in **Figure 8, Aerial View – Ohlone Cluster Site**, there are three buildings located within the Ohlone Cluster**.** This improvement project would result in the demolition of Buildings 19 and 20 while Building 18 would remain. Building 19 would be demolished with the exception of its foundation while Building 20 (including foundation) will be completely removed. The purpose of the demolition is to facilitate construction of the Jonas Center, a combined community-based facility and Rotary site, which will be built at a later date upon completion of additional environmental review.

2. Surrounding Land Uses and Environmental Setting:

The Indian Valley Campus is surrounded by open space and residential development. A dense residential area that includes both single-family and multi-family residential development, a park and a middle school is located to the east. Open space that is owned and maintained by both private and public entities is located to the north, south and west.

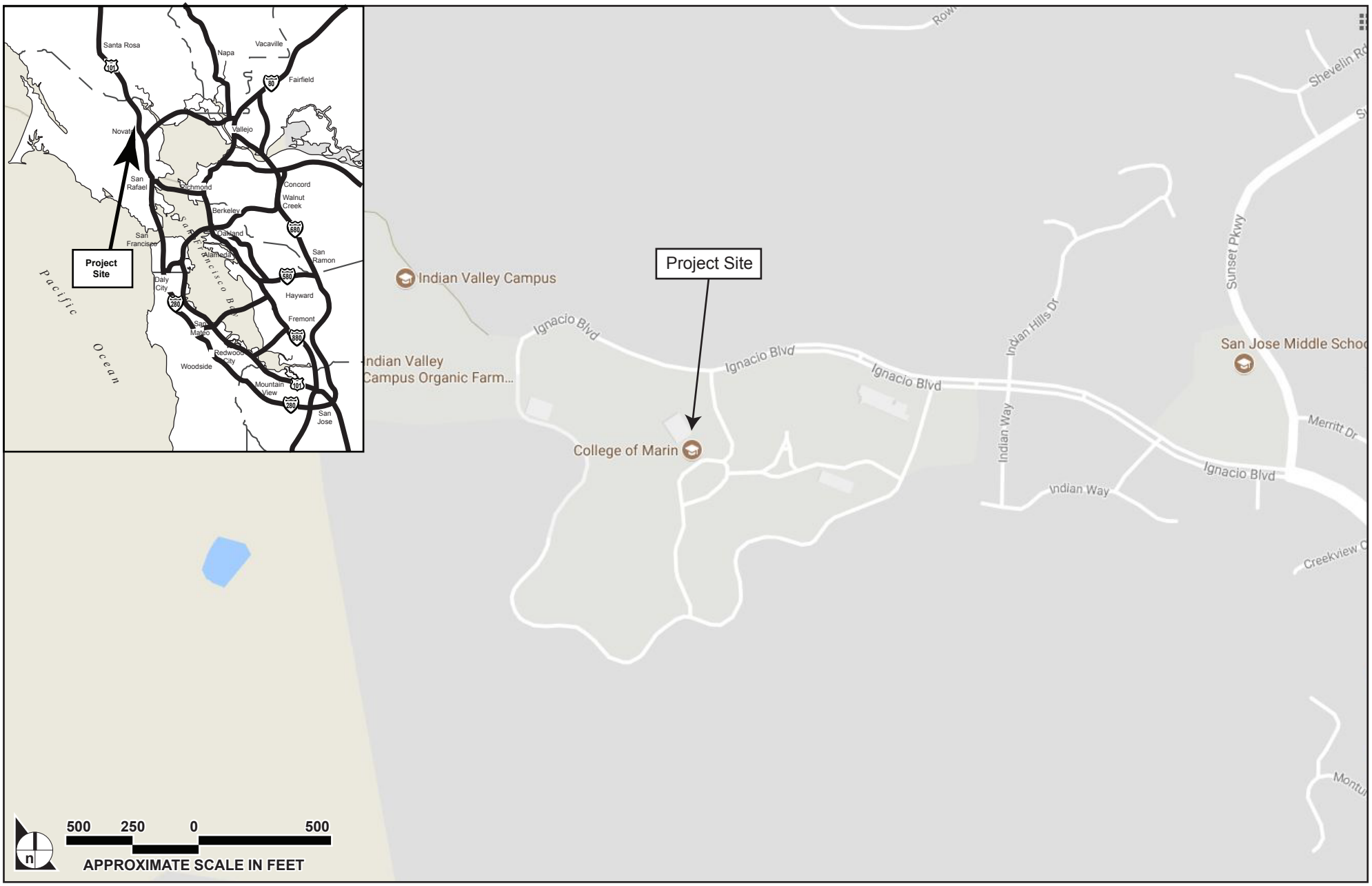
3. Discretionary approval authority and other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

As a public agency principally responsible for approving or carrying out the proposed project, the College of Marin is the Lead Agency under CEQA. The College of Marin Board of Trustees would be responsible for reviewing and certifying the adequacy of the environmental document and approving the proposed project.

The following additional agencies would be involved in discretionary approvals and permits required for various project components:

- The **Division of State Architect (DSA)** reviews community college project designs to determine compliance with the California Building Code, fire safety, and Americans with Disabilities Act (ADA) requirements.

- The **State Fire Marshal's Office** has delegated fire code regulatory responsibilities for community college facilities to DSA.



SOURCE: Google Earth, 2017

FIGURE 1

IMPACT SCIENCES

Regional and Project Vicinity

1304.001•07/17

SOURCE: Google Earth, 2017

FIGURE **2**

IMPACT SCIENCES

Aerial View – Indian Valley Campus

1304.001•07/17

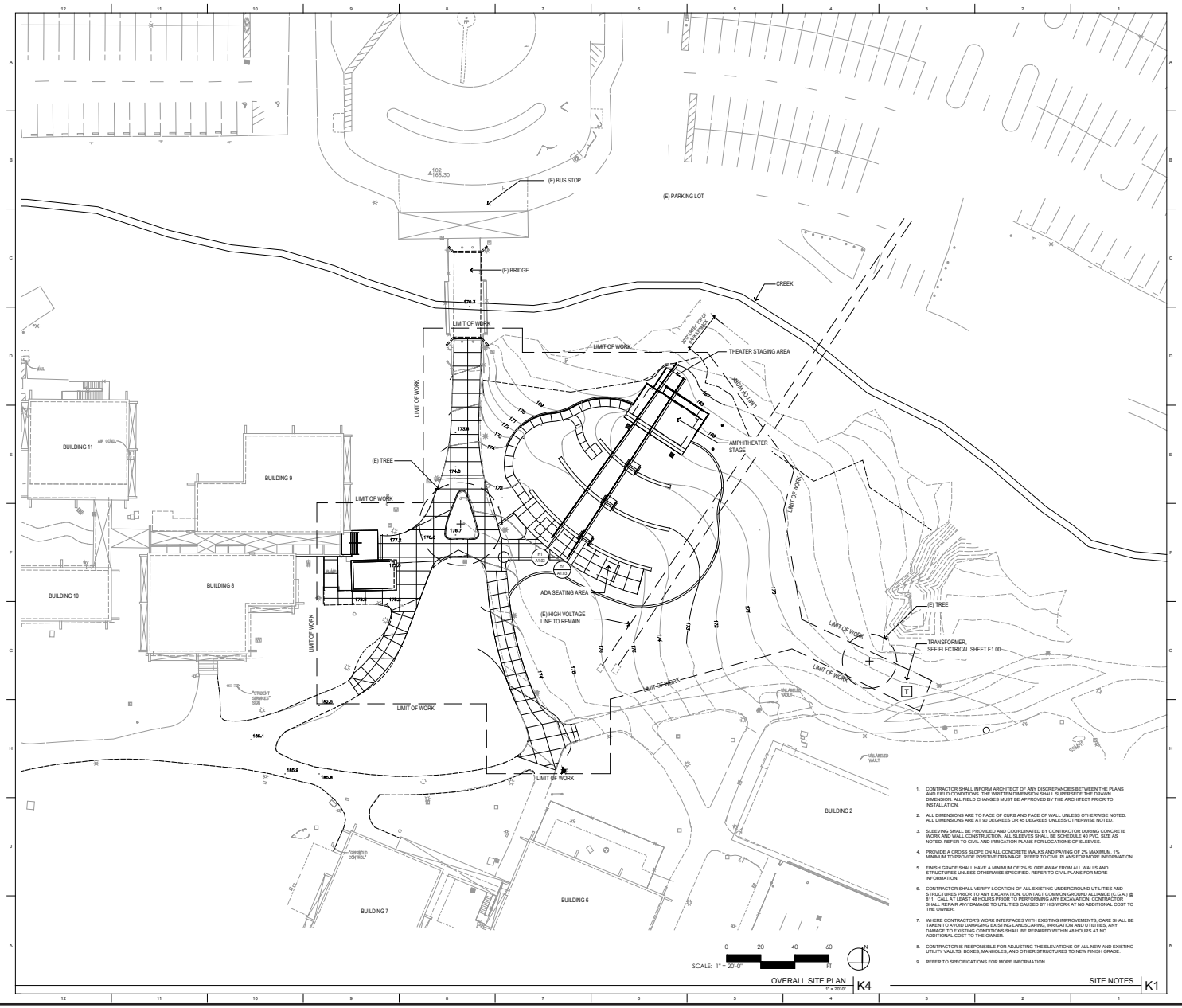
SOURCE: Google Earth, 2017

FIGURE 3

IMPACT SCIENCES

Aerial View – Outdoor Amphitheater Site

1304.001•06/17



SOURCE: LPAS, 2017

FIGURE **4**

IMPACT SCIENCES

Proposed Site Plan – Outdoor Amphitheater Site

1304.001•06/17

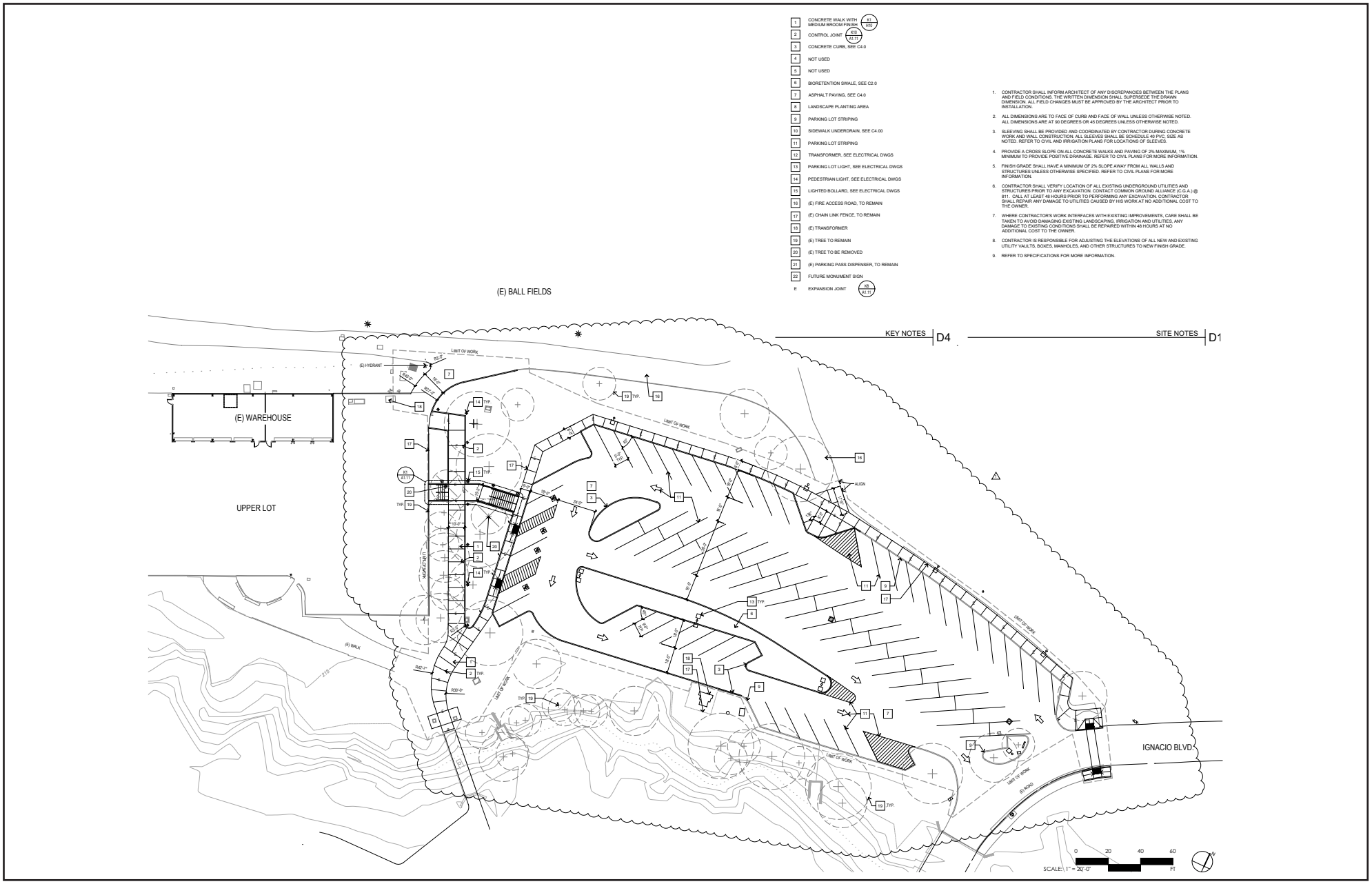
SOURCE: Google Earth, 2017

FIGURE 5

IMPACT SCIENCES

Aerial View – Organic Farm Improvements

1304.001•06/17



SOURCE: LPAS, 2017

FIGURE **6**

IMPACT SCIENCES

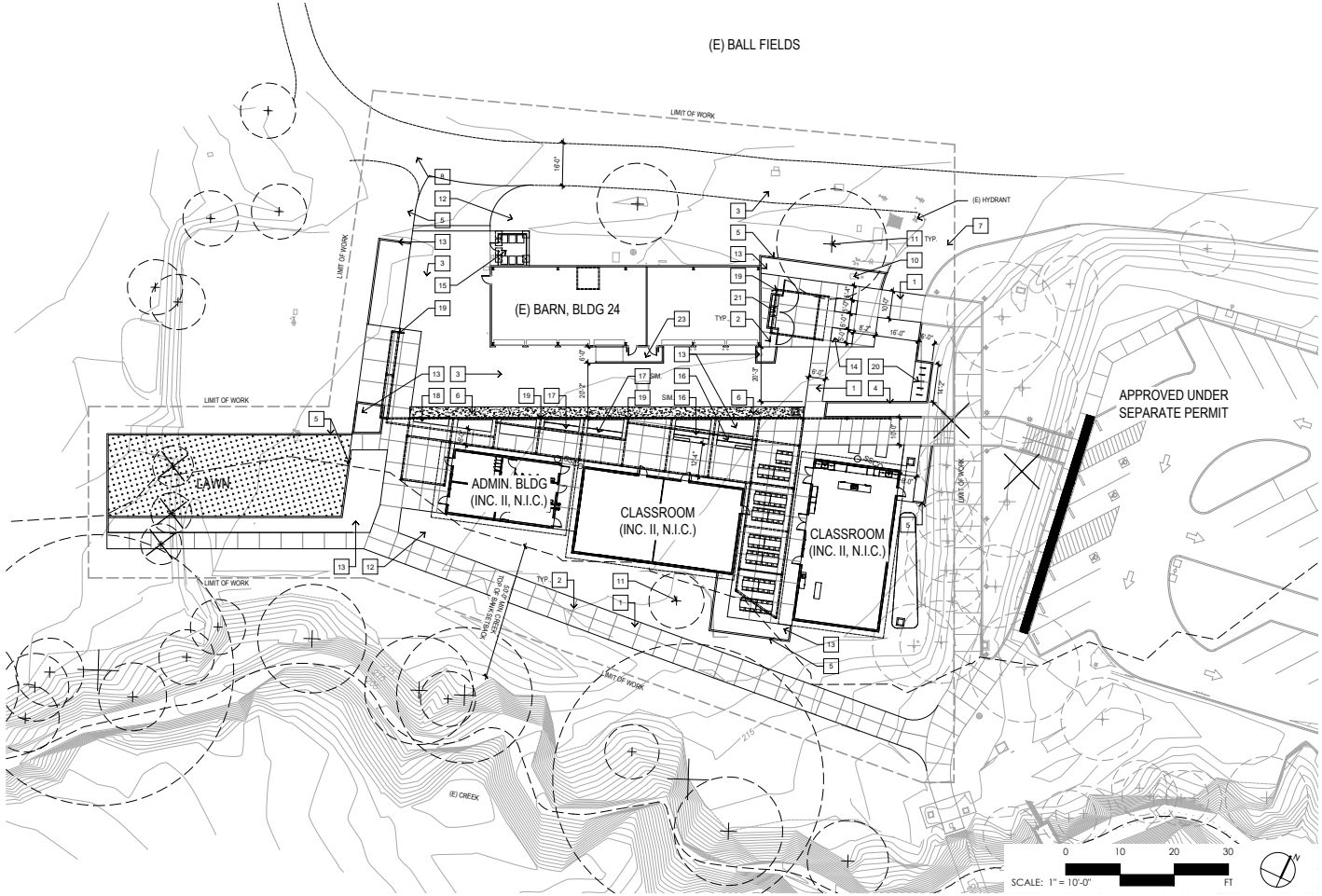
Proposed Site Plan – Parking Lot No. 6

1304.001•07/17

1. CONTRACTOR SHALL INFORM ARCHITECT OF ANY DISCREPANCIES BETWEEN THE PLANS AND FIELD CONDITIONS. THE WRITTEN DIMENSION SHALL SUPERSEDE THE DRAWN DIMENSION. ALL FIELD CHANGES MUST BE APPROVED BY THE ARCHITECT PRIOR TO INSTALLATION.
2. ALL DIMENSIONS ARE TO FACE OF CURB AND FACE OF WALL UNLESS OTHERWISE NOTED. ALL DIMENSIONS ARE AT 90 DEGREES OR 45 DEGREES UNLESS OTHERWISE NOTED.
3. SLEEVING SHALL BE PROVIDED AND COORDINATED BY CONTRACTOR DURING CONCRETE WORK AND WALL CONSTRUCTION. ALL SLEEVES SHALL BE SCHEDULE 40 PVC, SIZE AS NOTED. REFER TO CIVIL AND IRRIGATION PLANS FOR LOCATIONS OF SLEEVES.
4. PROVIDE A CROSS SLOPE ON ALL CONCRETE WALKS AND PAVING OF 2% MAXIMUM, 1% MINIMUM TO PROVIDE POSITIVE DRAINAGE. REFER TO CIVIL PLANS FOR MORE INFORMATION.
5. FINISH GRADE SHALL HAVE A MINIMUM OF 2% SLOPE AWAY FROM ALL WALLS AND STRUCTURES UNLESS OTHERWISE SPECIFIED. REFER TO CIVIL PLANS FOR MORE INFORMATION.
6. CONTRACTOR SHALL VERIFY LOCATION OF ALL EXISTING UNDERGROUND UTILITIES AND STRUCTURES PRIOR TO ANY EXCAVATION. CONTRACTOR SHALL REPAIR ANY DAMAGE TO UTILITIES CAUSED BY HIS WORK AT NO ADDITIONAL COST TO THE OWNER.
7. WHERE CONTRACTOR'S WORK INTERFACES WITH EXISTING IMPROVEMENTS, CARE SHALL BE TAKEN TO AVOID DAMAGING EXISTING LANDSCAPING, IRRIGATION AND UTILITIES, ANY DAMAGE TO EXISTING CONDITIONS SHALL BE REPAIRED WITHIN 48 HOURS AT NO ADDITIONAL COST TO THE OWNER.
8. CONTRACTOR IS RESPONSIBLE FOR ADJUSTING THE ELEVATIONS OF ALL NEW AND EXISTING UTILITY VAULTS, BOXES, MANHOLES, AND OTHER STRUCTURES TO NEW FINISH GRADE.
9. REFER TO SPECIFICATIONS FOR MORE INFORMATION.

SITE NOTES | F10

1	CONCRETE WALK WITH MEDIUM BROOM FINISH	B1 / H10
2	CONTROL JOINT	D1 / A1.11
3	ASPHALT PAVING, SEE CX.XX	
4	CONCRETE CURB, SEE CX.XX	
5	CONCRETE MOW STRIP	F3 / A1.11
6	CONCRETE VALLEY GUTTER, SEE CX.XX	
7	(E) FIRE ACCESS, TO REMAIN	
8	(E) GRAVEL ROAD	
9	NOT USED	
10	TRANSFORMER, SEE ELECTRICAL EX.XX	
11	(E) TREE TO REMAIN	
12	(E) LANDSCAPE AREA	
13	LANDSCAPE PLANTING AREA	
14	DECOMPOSED GRANITE TREE PLANTER	
15	TRASH ENCLOSURE	D9 / A1.11
16	CONCRETE SEAT WALL A	H1 / A1.11
17	CONCRETE SEAT WALL B	H3 / A1.11
18	CONCRETE SEAT WALL C	H5 / A1.11
19	STEEL WIDE FLANGE SHADE STRUCTURE	K1 / A2.03
20	BIKE RACK	D5 / A1.11
21	FARM STAND	XX / AX.XX
22	NOT USED	
23	ACCESSIBLE ENTRY	B5 / A1.11
E	EXPANSION JOINT	F1 / A1.11



SOURCE: LPAS, 2017

FIGURE 7

IMPACT SCIENCES

Proposed Site Plan – Organic Farm Classroom Complex

1304.001•09/17

SOURCE: Google Earth, 2017

FIGURE **8**

IMPACT SCIENCES

Aerial View – Ohlone Cluster Site

1304.001•07/17

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- ☐ Aesthetics
- ☐ Air Quality
- ☐ Cultural Resources
- ☐ Greenhouse Gas Emissions
- ☐ Hydrology/Water Quality
- ☐ Mineral Resources
- ☐ Population and Housing
- ☐ Recreation
- ☐ Tribal Cultural Resources
- ☐ Mandatory Findings of Significance
- ☐ Agriculture and Forestry Resources
- ☐ Biological Resources
- ☐ Geology and Soils
- ☐ Hazards and Hazardous Materials
- ☐ Land Use/Planning
- ☐ Noise
- ☐ Public Services
- ☐ Transportation/Circulation
- ☐ Utilities/Service Systems

IV. DETERMINATION

On the basis of the initial evaluation that follows:

- ☐ I find that the proposed project WOULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- ■ I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made that would avoid or reduce any potential significant effects to a less than significant level. A MITIGATED NEGATIVE DECLARATION will be prepared.

- ☐ I find that the proposed project MAY have a significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT will be prepared.

09/11/2017

Greg Nelson — Date

Vice President for Finance & College Operations

V. EVALUATION OF ENVIRONMENTAL IMPACTS

During the completion of the environmental evaluation, the City relied on the following categories of impacts, noted as column headings in the IS checklist. All impact determinations are explained, and supported by the information sources cited.

A) "Potentially Significant Impact" is appropriate if there is substantial evidence that the project's effect may be significant. If there are one or more "Potentially Significant Impacts" for which effective mitigation may not be possible, a Project EIR will be prepared.

B) "Less Than Significant With Mitigation Incorporated" applies where the incorporation of project-specific mitigation would reduce an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All mitigation measures must be described, including a brief explanation of how the measures would reduce the effect to a less than significant level.

C) "Less Than Significant Impact" applies where the project would not result in a significant effect (i.e., the project impact would be less than significant without the need to incorporate mitigation).

D) "No Impact" applies where the project would not result in any impact in the category or the category does not apply. This may be because the impact category does not apply to the proposed project (for instance, the project site is not within a surface fault rupture hazard zone), or because of other project-specific factors.

Impact Questions and Responses

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
1. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	■	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	■	☐

Environmental Setting

Most of the Indian Valley Campus is located on steep terrain. The topography of the main campus generally slopes up to the south from Ignacio Creek. A dense residential area lies to the east of the campus. Open space consisting of steep hillsides covered in chaparral and oak woodlands encircle the campus on the north, west and south. Stretching east to form part of Novato's southwestern border, the hillsides to the south and west are designated as scenic resources in the *City of Novato General Plan (1996)* and the *Draft City of Novato General Plan 2035.* Due to the topography and the wooded nature of the area, public long-range views of project sites on the campus are only available intermittently from segments of nearby roadways.

Discussion of Potential Project Impacts

a) ***Less than Significant Impact.*** A scenic vista is generally defined as an expansive view of highly valued landscape as observable from a publicly accessible vantage point. As discussed above, publically accessible long-range views of project sites on the campus are only available intermittently from segments of nearby roadways due to prevailing topography and vegetation. Hillsides to the west and south are designated as scenic resources in the *City of Novato General Plan (1996)* and the *Draft City of Novato General Plan 2035*. However, as the proposed structures would only be one-story high, the proposed project would not substantially block views of the hills from nearby roadways. For these reasons, the impact of the proposed project on scenic vistas would be less than significant.

b) ***No Impact.*** The campus is not located adjacent to a state scenic highway (Caltrans 2015) and does not contain scenic resources as identified in the *City of Novato General Plan (1996)* and *Draft City of Novato General Plan 2035* or any other land use plans. As a result, the proposed project would have no impact with regard to this criterion.

c). ***Less than Significant Impact***. The project sites are located in developed portions of the campus, and thus the proposed changes would not adversely affect the visual quality of the campus. The proposed organic farm classroom complex would be located within the existing corporation yard at the western end of the campus, across from an existing warehouse building, while the outdoor amphitheater would be located towards the eastern end of the campus, north of the Pomo Cluster. The campus is a mix of architectural styles without a dominating design or aesthetic. As such, the proposed structures would be compatible with the visual character of the area, and the impact of the proposed project with regard to visual character would be less than significant.

d) ***Less than Significant Impact***. The amphitheater would require minimal lighting and would consist of safety lighting on the stairs and paths and dimmable lighting on the stage structure. The lights at the amphitheater would be directed downwards and would only be utilized on occasion for nighttime events. No theatrical lighting is included in the design of the amphitheater. Lighting associated with the organic farm improvements would consist of security lighting for the classroom buildings and light poles for the parking lot. All lighting would be directed downward and thus is not expected to create substantial new illumination in the area. In addition, the nearest residences to the organic farm site are located approximately a half mile to the east of Parking Lot No. 6 and thus would not be affected by the lighting associated with organic farm improvements. No new lighting would be associated with the other organic farm improvements. Finally, all demolition activity within the Ohlone cluster would take place during daytime hours and thus would not require nighttime lighting. For these reasons, potential light and glare impact generated by the proposed project would be less than significant.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP would be consistent with the existing campus setting, and thus when combined with the improvements to be constructed under the proposed project, would not result in adverse effects with regard to aesthetics. In addition, the remaining improvement projects listed in the 2016-2021 FMP would undergo additional environmental review when they are scheduled to be constructed, and if required, mitigation would be provided to reduce impacts with regard to aesthetics. As a result, the cumulative impact of campus development with respect to aesthetics would be less than significant.

There are no planned or recently approved off-site developments in the immediate vicinity of the campus. The closest planned or recently approved project in the City of Novato is the Oakmont Senior Living project, located over one mile to the north of the campus at 1461 South Novato Boulevard. As a result, the proposed project would not combine with other planned or recently approved projects in the city to have a substantial adverse effect on scenic vista, scenic resources, and the existing visual character of the surrounding area. In addition, the proposed improvements would not combine with other planned or recently approved projects in the city to create new sources of substantial light or glare that may adversely affect day or nighttime views in the area. There would be no cumulative impact with regard to aesthetics.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FORESTRY RESOURCES – Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	■
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526)?	☐	☐	☐	■
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	☐	☐	☐	■

Environmental Setting

The campus is designated as Urban and Built-Up Land and Other Land on maps prepared by the California State Department of Conservation pursuant to the Farmland Mapping and Monitoring Program (FMMP) (FMMP 2014). The only agricultural activities on the campus occur on the organic farm; no portion of the campus is devoted to large-scale agricultural use. The Natural Resources Conservation Service (NRCS) Web Soil Survey designates the soils on the campus as Not Prime Farmland. Residential areas border the campus to the east, and steep hillsides border the campus to the north, south and west.

Discussion of Potential Project Impacts

a) ***No Impact.*** The campus is designated as Urban and Built-up Land and Other Land by the FMMP (FMMP 2014). As a result, implementation of the proposed project would not result in the conversion of land designated either as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. There would be no impact with regard to this criterion.

b) ***No Impact.*** No part of the campus is under Williamson Act contract and no part of the campus is zoned for agricultural use (DOC 2014). There would be no impact with regard to this criterion.

c-d) ***No Impact.*** Timberland is defined in PRC Section 4526 as "land designated by the board[1] as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees" while forest land is defined in PRC Section 12220(g) as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." The campus contains no mapped timberland, and although the improvement projects are located in a heavily wooded area, no forest land would be converted to non-forest use with construction of the proposed project. There would be no impact with regard to these criteria.

e) ***No Impact.*** The campus is designated as Urban and Built-up Land and Other Land by the FMMP. No designated farmland is present in the vicinity of the project sites. Therefore, the proposed project would not involve any changes that could indirectly cause conversion of Farmland to non-agricultural use. There would be no impact with regard to this criterion.

Discussion of Potential Cumulative Impacts

The campus and the City of Novato are urban in nature, and do not contain Farmland based on maps prepared pursuant to the FMMP. As a result, the improvement projects listed in the 2016-2021 FMP, including the improvements to be constructed under the proposed project, and planned or recently approved development in the city would not result in the loss of farmland. In addition, lands on the campus and in the city are zoned for urban uses. Therefore, future development on campus and in the city would not displace land zoned for agricultural use or forest land or timberland, and would not conflict with land under Williamson Act contact. There would be no cumulative impact with regard to agricultural resources.

1 Board of Forestry and Fire Protection

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
3. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation (e.g., induce mobile source carbon monoxide (CO) emissions that would cause a violation of the CO ambient air quality standard)?	☐	■	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	■	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	■	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	■	☐

Environmental Setting

The project area is subject to air quality planning programs developed in response to both the Federal Clean Air Act (CAA) and the California Clean Air Act (CCAA). Marin County is in the San Francisco Bay Area Basin and is regulated by the US Environmental Protection Agency (EPA), the California Air Resources Board (CARB), and the Bay Area Air Quality Management District (BAAQMD).

The campus is located in the City of Novato, which is included in the San Francisco Bay Area Air Basin (SFBAAB or Air Basin). Air quality in the Air Basin is monitored by the BAAQMD and CARB. Based on pollutant concentrations measured at monitoring stations within the Air Basin, the SFBAAB is classified as being either in attainment or non-attainment of federal and state air quality standards. The Air Basin is designated nonattainment for the federal and state ozone 8-hour standard, the state ozone 1-hour standard, the state Particulate Matter 10 microns or less (PM10) standard, and the state and federal Particulate Matter 2.5 microns (PM2.5) standards. For all other federal and state standards, the Air Basin is in attainment or unclassified.

Some groups of people are considered more sensitive to adverse effects from air pollution than the general population. These groups are termed "sensitive receptors." Sensitive receptors in the vicinity of the campus include residences and a middle school, which are located approximately 900 feet and 1,350 feet, respectively, to the east of the closest project site (amphitheater).

The *BAAQMD CEQA Air Quality Guidelines* ("BAAQMD Guidelines") set forth methodologies and quantitative significance thresholds that a lead agency may use to estimate and evaluate the significance of a project's air emissions. The BAAQMD Guidelines present thresholds for evaluating both construction-phase and operational emissions, and include numeric thresholds for criteria pollutants and health-based evaluation criteria for toxic air contaminants (TAC). The BAAQMD Guidelines do not recommend quantification of fugitive dust emissions but note that the impact from a project's fugitive dust emissions during construction would be significant unless dust control measures and other best management practices are implemented.

Discussion of Potential Project Impacts

a) ***Less than Significant Impact***. The most recent clean air plan is the *Bay Area 2010 Clean Air Plan* that was adopted by the BAAQMD in September 2010. A project would be considered to conflict with or obstruct implementation of the regional air quality plans if it would be inconsistent with the emissions inventories contained in the regional air quality plans. Emission inventories are developed based on projected increases in population and vehicle miles traveled (VMT) within the region. The improvements to be constructed under the proposed project are small scale in nature and would not result in an increase in campus population or a related increase in vehicle miles traveled within the region. Since air pollutants would be generated mainly by project grading, construction, and related vehicle trips to and from the site by workers and not by a permanent increase in the population of the area, the proposed project would have a less than significant impact.

b-c) ***Less than Significant Impact with Mitigation***. Implementation of the proposed project would result in short-term emissions associated with ground disturbance and use of construction equipment and vehicles. Minimal emissions are anticipated after the activities are completed, for reasons presented below.

Construction

Construction of both the outdoor amphitheater and the organic farm improvements is anticipated to last three to four months, depending on weather conditions. Demolition activities in the Ohlone Cluster would last one week. Implementation of the proposed project would result in short-term emissions associated with ground disturbance, use of construction equipment and vehicles, and demolition activities. Minimal emissions are anticipated after such activities are completed. Emissions of criteria pollutants from excavation activities, grading and off-hauling were estimated using the CalEEMod model. A conservative scenario was modeled that assumed that all improvement projects would be under construction at the same time. Detailed assumptions associated with construction and demolition associated with the proposed project is included in **Appendix B**. The estimated construction emissions are provided below in **Table 1, Estimated Construction Emissions**.

Table 1
Estimated Construction Emissions (pounds/day)

	CO	NOx	ROG	PM10 (Fugitive Dust)	PM10 (Exhaust)	PM2.5 (Exhaust)
Improvement Projects						
Outdoor Amphitheater	9	13	1	1	1	1
Organic Farm Improvements	16	28	5	5	2	2
Ohlone Complex Demolition	9	11	1	1	1	1
Total	*34*	*52*	*7*	*7*	*4*	*4*
Significance Thresholds	**None**	**54**	**54**	**None**	**82**	**54**
Exceedance?	No	No	No	No	No	No

Source: Impact Sciences, Inc. 2017.

As shown in **Table 1**, the proposed project would result in emissions that would not exceed the thresholds of significance for criteria pollutants. The impact from air pollutant emissions during the construction-phase of the improvement projects would be less than significant.

Fugitive Dust

As mentioned above, movement of construction equipment, especially on unpaved surfaces, during construction activities and off-hauling excavated materials could temporarily generate fugitive dust, including PM10 and PM2.5 emissions. Unless properly controlled, vehicles leaving the site would deposit mud on local roadways, which could be an additional source of airborne dust after it dries. Fugitive dust emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. Fugitive dust emissions would also depend on soil moisture, silt content of soil, wind speed, and the amount of equipment operating. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site. The BAAQMD Guidelines consider the impact from a project's construction-phase dust emissions to be less than significant if best management practices listed in the guidelines are implemented. Without these BMPs, the impact from fugitive dust emissions would be potentially significant. Thus, to ensure that construction-phase emissions are controlled and minimized, **Mitigation Measure AIR-1** is included which requires that dust control and other BMPs put forth by the BAAQMD are implemented by the proposed project.

> **Mitigation Measure AIR-1:** The construction contractor(s) shall implement the following BMPs during project construction:
>
> - All exposed surfaces (e.g., parking areas, staging areas, soil stockpiles, graded areas, and unpaved access roads) shall be watered two times per day.
> - All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
> - All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible and feasible.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Community Health Risk

In addition to an evaluation of the potential impacts from a project's construction-phase emissions of criteria pollutant and fugitive dust, the BAAQMD Guidelines recommend an evaluation of potential community health risk and hazards from a project's construction emissions of TACs. For assessing community risks and hazards, a 1,000 foot radius around the project boundary is recommended in the BAAQMD Guidelines. The proposed project would involve the use of diesel-fueled construction equipment which would result in diesel particulate emissions which are considered a TAC in the vicinity of the work areas. Due to the nature of the proposed project, the fact that only a few pieces of equipment would be used on each site (no more than 3 pieces of equipment), and the short duration of work, the potential for a significant impact is low. However, because sensitive receptors such as residences are located less than 1,000 feet from where project construction activities would occur and could be potentially affected, conservatively the impact is considered potentially significant. To avoid impacts to nearby sensitive receptors, the project will be required to implement **Mitigation Measure AIR-2** which will ensure that cleaner engines are utilized for construction equipment to reduce diesel particulate emissions.

> **Mitigation Measure AIR-2:** All diesel-powered off-road equipment larger than 50 horsepower and operating on the site for more than two days continuously during the duration of construction shall, at a minimum, meet U.S. EPA emissions standards for Tier 3 engines or equivalent.

Operation

Operational air emission impacts are associated with any change in permanent use of the campus, as a land use change can add new on-site stationary or area sources to the campus or increase the number of vehicles trips to and from the campus. No land use change is proposed as a part of the proposed project. It is not anticipated that the outdoor amphitheater or the organic farm classroom complex would significantly and permanently increase vehicle trips to the area, as the proposed facilities would be utilized mostly by students and campus staff. Therefore, operational emissions associated with the

proposed project would not change substantially from existing conditions, and would not exceed the applicable BAAQMD thresholds of significance for operational emissions. The impact from air pollutant emissions during operation would be less than significant.

d) ***Less than Significant Impact with Mitigation.*** The potential for project construction activities to affect sensitive receptors is analyzed under **Item 3(b)** above. As noted there, although TAC emissions during construction could result in a potentially significant community health impact, it would be reduced to a less than significant level by **Mitigation Measure AIR-2** set forth above.

e) ***Less than Significant Impact.*** The proposed project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. The odor from these emissions may be noticeable from time to time to adjacent receptors. However, they would be localized and are not likely to adversely affect people off site, and result in confirmed odor complaints. The project would not include any sources of significant odors that would cause complaints from surrounding uses. This impact would be less than significant.

Discussion of Potential Cumulative Impacts

According to the BAAQMD's Guidelines, project emissions that do not exceed the BAAQMD emission thresholds would not have a significant cumulative impact. The mass-based significance thresholds published by the BAAQMD include impacts from projected growth in the SFBAAB, so that cumulative impacts are addressed by the significance threshold. As shown in **Table 1**, above, the proposed project would not result in emissions during construction that exceed emission thresholds. Also as noted above, operational emissions associated with the proposed project would not change substantially from existing conditions, and thus would not exceed the applicable BAAQMD thresholds of significance for operational emissions.

None of the remaining improvement projects listed in the 2016-2021 FMP are scheduled to be constructed at this time. In addition, there are no planned or recently approved off-site developments within the immediate vicinity of the campus. The closest planned or recently approved project in the City of Novato is the Oakmont Senior Living project, located over one mile to the north of the campus at 1461 South Novato Boulevard. As a result, the proposed project would not combine with other planned or recently approved projects on the campus or in the city to expose sensitive receptors to substantial pollutant concentrations, such as TAC emissions during construction, or objectionable odors.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	■	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	■
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	■	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	■	☐
e) Conflict with any applicable policies protecting biological resources?	☐	☐	☐	■
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?	☐	☐	☐	■

A Biological Habitat Evaluation was prepared for the proposed improvement projects by Pacific Biology, Inc. in July 2017. The evaluation included a database search of special-status wildlife and plant species that could occur on or near the campus, a review of aerial photography to determine habitat types on or near the campus, and a visit to each of the project sites to document existing conditions. A copy of the Biological Habitat Evaluation is provided in **Appendix C**.

Environmental Setting

Existing Conditions

Site reconnaissance was conducted as part of the Biological Habitat Evaluation to evaluate existing conditions on and near the project sites. The first site visit was conducted in May 2017 and two additional site visits were completed in July 2017. The site visits included walking the project sites to achieve 100 percent visual coverage, recording the dominant plant species present, characterizing the habitat types present on and near the sites, and identifying all wildlife species observed. A visual search was also conducted as part of the site visits to check for the presence of jurisdictional habitats (e.g., wetlands, creeks), sensitive habitats (e.g., native grasslands), and habitat features (e.g., small mammal burrows) used by special-status species known from the project region. A description of existing conditions on each of the project sites based on the site visit is presented below.

Outdoor Amphitheater

The site of the proposed outdoor amphitheater is located on an undeveloped portion of the campus bordered to the north by Ignacio Creek, and to the south and west by existing campus buildings and paved footpaths. The site primarily includes undeveloped land in the central campus area, but also includes some surrounding paved footpaths. Mature California bay laurel (*Umbellularia californica*) and coast live oak (*Quercus agrifolia*) trees occur throughout the site, with the tree canopy becoming denser closer to the creek. There are also a small number of California buckeye (*Aesculus californica*) trees on the site.

The undeveloped portions of the site are regularly mowed and the groundcover is dominated by non-native grasses and weedy herbaceous species. These areas include the proposed site of the amphitheater, as well as portions of the proposed irrigation line alignment (see **Appendix C** for location of alignment); all of these areas are near paved walkways and buildings. Non-native plants observed included foxtail barley (*Hordeum jubatum*), wild oat (*Avena sp.*), soft chess (*Bromus hordeaceus*), Italian ryegrass (*Lolium multiflorum*), quaking grass (*Briza maxima*), Italian thistle (*Carduus pycnocephalus*), filaree (*Erodium botrys*), scarlet pimpernel (*Lysimachia arvensis*), cat ears (*Hypochaeris radicata*), and English daisy (*Bellis perennis*); many of these plants have showy flowers, which were in bloom at the time of the May site visit. The native wildlife flower sun cup (*Taraxia sp.*) was also observed on the site. All undeveloped portions of the site had been recently mowed prior to the July site visits. No ground squirrel burrows were observed on the site, but pocket gopher activity was noted.

Ignacio Creek is to the north of the site of the proposed outdoor amphitheater. This seasonal creek appears to be a tributary to Arroyo San Jose. In the project area, the creek supports a dense growth of coast live oak and bay trees, as well as some California buckeye. Understory vegetation along and bordering the creek banks (that does not occur elsewhere on the site) includes poison oak (*Toxicodendron diversilobum*), Himalayan blackberry (*Rubus armeniacus*), California blackberry (*Rubus ursinus*), and horsetail (*Equisetum arvense*). At the time of the May and July site visits, there was slow, shallow flowing water and several small pools (approximately 10-inches deep) in the creek, but some upstream stretches were dry. In the project area, the creek does not support willows (*Salix sp.*) or other true riparian-associated tree species. Grading is not proposed within 20 feet of the creek's top of bank, but vegetation clearing could occur, as needed, closer to the creek. No work is proposed below the top of the creek bank.

Organic Farm Improvements

The site of the proposed organic farm improvements is located in the western portion of the campus, and is developed with Parking Lot No. 6 and the corporation yard. However, some of the project elements including the relocation of existing structures, a new trail and a new deer fence would be constructed on previously undeveloped land.

Vegetation on the developed portions of the site is limited to weedy plant species that have taken root in cracks in the asphalt, including species such as foxtail barley, pineapple weed (*Matricaria discoidea*), yellow-star thistle (*Centaurea solstitialis*), and fennel (*Foeniculum vulgare*).

Herbaceous vegetation in undeveloped portions of the site, such as the proposed trail and deer fence locations, consists primarily of weedy plants and annual grasses, such as wild oats, ripgut brome (*Bromus diandrus*), Harding grass (*Phalaris aquatic*), English plantain (*Plantago lanceolata*), field bind weed (*Convolvulus arvensis*), and coyote brush (*Baccharis pilularis*). Stinkwort (*Dittrichia graveolens*), an invasive species, is also present near the proposed trail location. There are scattered oak, bay, and buckeye trees in the undeveloped portions of the site. These trees would not be removed as part of the parking lot renovation. However, a large pine tree located to the west of the corporation yard would be removed to accommodate the relocation of a greenhouse. The proposed new trail would generally follow the alignment of existing informal trails that traverse disturbed grassland areas that are just outside of the woodland associated with Ignacio Creek.

There is a small, potentially jurisdictional wetland located immediately to the west of where the corporation yard's cement ends; this area is separated from the greenhouse by an existing fence. The area is approximately 100 square feet, is dominated by curly dock (*Rumex Crispus*), and pennyroyal (*Mentha pulegium*) also occurs. Curly dock is a facultative plant (meaning that it is equally likely to occur in wetlands and non-wetlands), while pennyroyal is an obligate wetland plant (meaning it occurs almost always under natural conditions in wetlands). A formal wetland delineation would be required to determine if the feature is jurisdictional.

Potentially jurisdictional wetlands also occur at locations between the organic farm and the athletic field; the proposed new deer fence would be constructed in this general area. The dominant wetland vegetation observed included sedge (*Cyperus sp.*) and pennyroyal. These wetland areas are generally located in a low-lying area between the organic garden and the field, and likely receive irrigation water from both areas; therefore, these wetlands may be the result of irrigation runoff and not natural features. A formal wetland delineation would be required to determine if these wetlands are jurisdictional.

There is an abandoned water tank in the undeveloped portion of the site, and there is a small channel from the base of the tank that connects to Ignacio Creek. The channel is shallow (approximately 1.5-feet deep) and narrow (approximately 3-feet wide), and is dominated by upland-associated vegetation such as dogtail grass (*Cynosurus echinatus*) and wild oat. The origin of the channel is not known, but it was likely formed through discharge/overflow from the water tank when it was functional because there are several old pipes in the channel and the channel is at the base of the tank's outlet.

The bay-oak woodland associated with Ignacio Creek generally borders the project site to the south. The vegetation associated with the creek is very similar to that occurring adjacent to the site of the outdoor amphitheater. However, the creek banks are steeply incised in this area and the creek was generally dry

at the time of the July site visits. The proposed organic farm improvements do not include any construction within the creek or the removal of any associated trees.

Ohlone Cluster Demolition

This project component includes the demolition of Buildings 19 and 20 within the Ohlone Cluster. These existing buildings do not appear to currently be in use and the buildings are immediately bordered by paved walkways. Vegetation associated with the buildings includes landscaping and non-native grasses and weedy plant species (e.g., Italian thistle, wild oats, dogtail grass). Building 19 is located near the intersection of Ignacio Creek and another seasonal creek while Ignacio Creek occurs to the north of Building 20. A bay-oak woodland occurs along the creek and vegetation within and bordering the creek includes species such as poison oak, horsetail, California blackberry and Himalayan blackberry. The creek is generally steeply incised in this area and portions of the creek were dry at the time of the July site visits. The proposed building demolition does not include any construction within the creek or the removal of any associated trees.

Special Status Species

The latest version of the California Natural Diversity Database (CNDDB) was reviewed for the project area as part of the Biological Habitat Evaluation. The intent of the database review was to document all occurrences of special-status species in the project area and to determine their location relative to the project sites. For purposes of this evaluation special-status wildlife species include those taxa listed or proposed for listing as Threatened or Endangered under the federal or state Endangered Species Acts, state or federal candidates for listing, state Species of Special Concern, state Fully Protected Species, federal Birds of Conservation Concern, and other species included on the California Department of Fish and Wildlife (CDFW) Special Animals List.[2]

A review of the CNDDB revealed that seven special-status wildlife species (i.e., Cooper's hawk, oak titmouse, white-tailed kite, pallid bat, Townsend's big-eared bat, western red bat, and hoary bat) have potential to occur on the project sites or in nearby areas that could be impacted by construction related noise. No special-status plant species have the potential to occur on or near the project sites.

Discussion of Potential Project Impacts

a) ***Less than Significant Impact with Mitigation.*** No special-status plant species have the potential to occur on any of the project sites while seven special-status wildlife species have the potential to occur on the project sites. A discussion of how the proposed project could affect these species is provided below.

Nesting Birds

Three special-status bird species (i.e. Cooper's hawk, oak titmouse, and white-tailed kite) could nest on the project sites and/or in nearby areas. In addition, numerous common bird species and raptors (e.g., great horned owl, red-shouldered hawk) could nest on and/or near the project sites. The actives nests of

---

2 The CDFW maintains a Special Animals List. "Special Animals" is a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status. The CDFG considers the taxa on this list to be those of greatest conservation need.

most native bird species are protected by the Migratory Bird Treaty Act (16 U.S.C. 704) and the California Fish and Game Code (Section 3503).

Numerous trees would be removed from the site of the outdoor amphitheater and one tree would be removed from the site of the organic farm improvements. Additionally, birds (e.g., swallows, black phoebe) could nest on the buildings to be removed. Therefore, tree removal and building demolition could result in the direct loss of a nest of a special-status bird species or of a species protected by the Migratory Bird Treaty Act and/or California Fish and Game Code. Additionally, construction-related noise could result in the noise-related abandonment of an active nest in a nearby area. Therefore, in the absence of avoidance measures, the proposed project could result in the loss of an active nest of a special-status bird species or of a species protected under the Migratory Bird Treaty Act and/or California Fish and Game Code. This represents a potentially significant impact. However, with the implementation of **Mitigation Measure BIO-1**, which requires that a pre-construction survey for nesting birds be conducted if construction occurs during nesting/breeding season, this impact would be reduced to a less than significant level.

> **Mitigation Measure BIO-1**: If construction activities would commence anytime during the nesting/breeding season of native bird species potentially nesting near the site (typically February through August in the project region), a pre-construction survey for nesting birds shall be conducted by a qualified biologist within two weeks prior to the commencement of construction activities.
>
> If active nests are found in areas that could be directly affected or are within 300 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted within them will be determined by taking into account factors such as the following:
>
> - Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity;
> - Distance and amount of vegetation or other screening between the construction site and the nest; and
> - Sensitivity of individual nesting species and behaviors of the nesting birds.

Roosting Bats

The proposed project would require the removal of numerous trees from the site of the outdoor amphitheater and one tree from the site of the organic farm improvements. All the trees to be removed provide potential roosting habitat for foliage roosting bat species such as western red bat and hoary bat. Should any of the larger trees to be removed contain deep crevices or cavities, they could provide potential habitat for communal cavity roosting species such as pallid bat. Additionally, the buildings to be demolished could provide roosting habitat for species such as pallid bat and Townsend's big-eared bat. Therefore, in the absence of avoidance measures, the proposed removal of trees and demolition of buildings could result in harm to roosting bats. This represents a potentially significant impact. However, with the implementation of **Mitigation Measure BIO-2a**, which requires that a focused tree habitat

assessment be conducted prior to the removal of any tree, and **Mitigation Measure BIO-2b**, which requires that a habitat assessment be conducted prior to the demolition of any structure, this impact would be reduced to a less than significant level.

Mitigation Measure BIO-2a: Prior to any tree removal, a qualified bat biologist shall conduct a focused tree habitat assessment of all trees that will be removed or impacted by construction activities. The habitat assessment should be conducted enough in advance to ensure tree removal can be scheduled during seasonal periods of bat activity. Trees containing suitable potential bat roost habitat features shall be clearly marked or identified. If day roosts are found to be potentially present, the biologist will prepare a site-specific roosting bat protection plan to be implemented. Based on site-specific conditions, the plan should incorporate the following guidance as appropriate:

When possible, removal of trees identified as providing suitable roosting habitat should be conducted during seasonal periods of bat activity, including:

1) Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than ½ inch of rainfall within 24 hours occurs; or

2) Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than ½ inch of rainfall within 24 hours occurs.

If it is determined that a colonial maternity roost is potentially present, the roost shall not be removed during the breeding season (April 15 to August 31) to the extent practicable. If a tree potentially containing a colonial maternity roost must be removed during the breeding season, then the following or other measures recommended by the qualified bat biologist may be implemented:

1) Acoustic emergence surveys or other appropriate methods shall be conducted/implemented to further evaluate if the roost is an active maternity roost.

    a) If it is determined that the roost is not an active maternity roost, then the roost may be removed in accordance with the other requirements of this measure;

    b) If it is found that an active maternity roost of a colonial roosting species is present, the roost shall not be disturbed during the breeding season.

Potential colonial hibernation roosts will only be removed during seasonal periods of bat activity. Potential non-colonial roosts that cannot be avoided shall be removed on warm days in late morning to afternoon when any bats present are likely to be warm and able to fly. Appropriate methods shall be used to minimize the potential of harm to bats during tree removal. Such methods may include using a two-step tree removal process. This method is conducted over two consecutive days, and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on Day 1. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed, to not return to the roost that night. The remainder of the tree is removed on Day 2.

Mitigation Measure BIO-2b: Prior to building demolition, a qualified bat biologist shall conduct a focused habitat assessment of all buildings to be demolished. The habitat assessment shall be conducted enough in advance to ensure that the commencement of building demolition can be scheduled during seasonal periods of bat activity (see above) if required. If no signs of day roosting activity are observed, no further actions will be required. If bats or signs of day roosting by bats are observed, a qualified bat biologist will prepare specific recommendations for either partial dismantling to cause bats to abandon the roost, or humane eviction, both to be conducted during seasonal periods of bat activity if required.

b) ***No Impact***. Sensitive plant communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special-status species or their habitat. The most current version of CDFW's *List of California Terrestrial Natural Communities* indicates which natural communities are of special-status given the current state of the California classification. The undeveloped portions of the project sites are dominated by non-native grasses and weedy herbaceous species. In addition, as discussed in more detail in **Item 4(c)** below, the nearby creek would be protected from incidental disturbance through the implementation of Best Management Practices (BMPs). Therefore, no sensitive plant communities would be impacted. There would be no impact with regard to this criterion.

c) ***Less than Significant Impact with Mitigation***. Wetlands, creeks, streams, and permanent and intermittent drainages are subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE) under Section 404 of the Federal Clean Water Act (CWA). The CDFW also generally has jurisdiction over these resources, together with other aquatic features that provide an existing fish and wildlife resource pursuant to Sections 1602-1603 of the California Fish and Game Code. The California State Water Resources Control Board and the nine Regional Water Quality Control Boards (RWQCB) also have jurisdiction over the waters of the state under the Porter Cologne Water Quality Control Act.

During the May and July 2017 site visits, a search was conducted for creeks, wetlands, and other potentially jurisdictional resources. Ignacio Creek occurs near all three project sites and it is expected that the creek is under the jurisdiction of the USACE, CDFW, and RWQCB. In the vicinity of the project site, there are no wetlands or "true" riparian vegetation (e.g., willows, alders) bordering the creek. Therefore, it is anticipated that regulatory jurisdiction does not extend beyond the top of the creek bank, or at most to any trees that are partially rooted in the creek bank.

The proposed project does not include any construction activities within the creek. On the site of the outdoor amphitheater, grading is not proposed within 20 feet of the creek's top of bank. Ground disturbance in the portion of the site adjacent to the creek would be limited to vegetation clearing (if needed). However, no tree removal is proposed within approximately 30 feet of the creek. On the site of the organic farm improvements, construction activities within 20 feet of the creek would be limited to currently paved areas and to portions of the proposed trail; these project activities would occur outside of the creek and would not require any tree removal. Demolition activities at the Ohlone Cluster would occur within currently developed and/or disturbed areas that are outside of the creek zone, and no tree removal is required for this project. Therefore, the proposed project would not directly impact the creek or associated vegetation. However, construction activities on each project site could indirectly impact the creek and associated vegetation, and this impact is considered potentially significant. However, with the implementation of **Mitigation Measure BIO-3a**, which requires the implementation of BMPs to protect the creek during construction, this impact would be reduced to a less than significant level.

> **Mitigation Measure BIO-3a**: Best Management Practices shall be implemented to protect the creek during construction activities, such as silt fencing and/or other erosion control measures, fencing to identify the creek as an environmentally sensitive area, staging equipment away from the creek, having a spill prevention plan, and instructing construction personnel about the sensitivity of the creek and the measures being implemented to protect it.

As previously discussed, there is an abandoned water tank in the undeveloped portion of the organic farm improvements site, and there is a small channel from the base of the tank that connects to Ignacio Creek. The channel is shallow (approximately 1.5-feet deep) and narrow (approximately 3-feet wide). The channel is dominated by upland vegetation (i.e., dogtail grass, wild oat). The origin of the channel is not known, but it was likely formed through discharge/overflow from the water tank when it was functional because there are several old pipes in the channel and the channel is at the base of the tank's outlet. Therefore, it does not appear that the channel is a natural feature. The proposed trail would cross the channel, but the specifics for crossing the small drainage had not been determined at the time of the publication of this Initial Study. As it appears that the channel is not a natural feature, its small size, and because it does not contain wetland vegetation, its disturbance would not be expected to rise to a level of significance under CEQA, and this impact is considered less than significant. However, should the proposed project require disturbance within the bed or bank of the channel, the CDFW should be contacted prior to that activity to confirm that the channel in not under their jurisdiction; if CDFW takes jurisdiction over the channel, a Streambed Alteration Agreement would be required.

During the site visits, a potentially jurisdictional wetland was identified on the organic farm site, at a location immediately to the west of where the corporation yard's paved area ends; this area is separated from the greenhouse by an existing fence. This potential wetland is approximately 100 square feet in size, is dominated by curly dock, and pennyroyal also occurs. A formal wetland delineation would be required to determine if the feature is jurisdictional. However, the proposed project does not appear to include any activities that would result in the fill of the wetland. The nearby greenhouse, which is on a paved area, would be disassembled and relocated, and a fence would be constructed in the area; it is not anticipated that these activities would result in fill of the potential wetland. Additionally, the potential wetland area is considered of low botanical value because it is dominated by curly dock, which is a non-native species characteristic of disturbed areas and that is not restricted to wetlands, and because of its small size (approximately 0.002 acre); therefore, the disturbance of the wetland would not be expected to rise to a level of significance under CEQA, and this impact is considered less than significant. However, should it be determined that the potential wetland would be impacted, the USACE and RWQCB should be consulted to determine if the feature is under their jurisdiction and any required permits/certifications obtained prior to fill of the wetland.

Potentially jurisdictional wetlands also occur at locations between the organic farm and the athletic field; the proposed new deer fence would be constructed in this general area. The dominant wetland vegetation observed included sedge and pennyroyal. These wetland areas are generally located in a low-lying area between the organic garden and the field, and likely receive irrigation water from both areas; therefore, these wetlands may be the result of irrigation runoff and not natural features. A formal wetland delineation would be required to determine if these wetlands are jurisdictional. Based on the existing site plans, the proposed deer fence would be constructed to the east of these wetland areas, and therefore, the wetland would not be substantially affected. However, given the proximity of the wetlands to the fencing location, the wetland could be incidentally disturbed and related impacts could be significant. However, with the implementation of **Mitigation Measures BIO-3b** discussed below, this impact would be reduced to a less than significant level.

Mitigation Measure BIO-3b The boundaries of the potential wetlands on the site of the organic farm improvements site shall be flagged or otherwise marked in the field prior to construction activities occurring within 20 feet of the features. Construction personnel shall be instructed to avoid the wetland areas.

d) ***Less than Significant Impact***. Wildlife corridors are described as pathways or habitat linkages that connect discrete areas of natural open space otherwise separated or fragmented by topography, changes in vegetation, and other natural or manmade obstacles such as urbanization. The project sites are located on a college campus and the proposed structures would be constructed near existing buildings. Additionally, the corporation yard is currently fenced and none of the proposed classroom structures would create a barrier to wildlife movement. There is also currently fencing around the organic farm garden and the proposed 2,400 feet of new deer fencing would be constructed in same general area, but would enclose a slightly larger area; the fencing would not extend into an expected wildlife movement corridor (e.g., Ignacio Creek). Further, the proposed project does not include any new light sources into the creek's corridor. Given the above, the project would not substantially interfere with the local or regional movement of wildlife species, and this impact would be less than significant.

e) ***No Impact***. No local policies protecting biological resources, such as tree protection ordinances, apply to the campus as the College is constitutionally exempt from local land use regulations whenever using property under its control in furtherance of its educational purposes. There would be no impact with regard to this criterion.

f) ***No Impact***. The campus is not located within any applicable habitat conservation plan, natural community conservation plan, or related plan (CDFW 2015). There would be no impact with regard to this criterion.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP could adversely affect biological resources on campus. Each project would undergo additional environmental review when they are scheduled to be constructed, and if required, mitigation would be provided to reduce impacts related to biological resources. As discussed above, with mitigation, the proposed project would have less than significant project-level impacts with respect to biological resources. Therefore, the contribution of the proposed project to the cumulative impact on biological resources located on campus would not be cumulatively considerable.

Anticipated future development in some portions of Novato has the potential to adversely affect biological resources in the City. However, numerous federal and State laws, regulations, and statues seek to protect biological resources, and these would apply to all development within the City. In addition, the current *City of Novato General Plan (1996)* and the *Draft City of Novato General Plan 2035* include policies for the protection of biological resources from unnecessary impacts. As discussed above, with implementation of mitigation, the proposed project would have less than significant project-level impacts on biological resources. Therefore, the contribution of the proposed project to the cumulative impact on biological resources in the City would not be cumulatively considerable.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☐	☐	■
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	■	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	■	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	■	☐

Environmental Setting

The buildings on the campus were constructed in the 1970s and are less than 50 years old. For this reason, there are no historical structures on the Indian Valley Campus. There are three documented archaeological sites on the campus, C-113, C-114, and PA-06-44, and shell midden (COM 2007). Human remains were discovered at Site C-113 while a small concrete footing, a metal wire embedded in two bay trees, a concrete water trough, concrete fragments, and the remains of a small water tank were found at Site C-114. In addition, midden containing shell, bone, obsidian, and heat-affected rock was identified in the vicinity of both sites. Parking lots currently exist at both sites. Site PA-06-44 is located on the western edge of the campus and consists of chert debitage and chert core (COM 2007).

There are also two prehistoric archaeological sites, CA-MRN-471 and CA-MRN-488, on the Indian Valley Campus. It is believed that the Arroyo San Jose watershed was occupied and utilized intensively from approximately A.D. 1350. Site CA-MRN-471, also known as the San Jose Village, was excavated in the early 1970s, resulting in the discovery of four semi-subterranean structures, tools, and ornaments. Site CA-MRN-488 consists of chert and obsidian debitage and tools (COM 2007).

Discussion of Potential Project Impacts

a) ***No Impact.*** There are no historical architectural resources on the Indian Valley Campus due to the age of the buildings. Therefore, the demolition of Buildings 19 and 20 would not result in the loss of historical resources. There would be no impact with regard to this criterion.

b, d) ***Less than Significant Impact.*** As discussed above, the Indian Valley Campus and vicinity are known to contain prehistoric archaeological sites. However, none of the improvements to be constructed under the proposed project would be located on or near these sites. The improvements to be constructed under the proposed project would require minimal ground disturbance or excavation, and in the case of

the organic farm improvements, it would occur in an area where the ground was previously disturbed when the existing parking lot and corporation yard was built. Therefore the potential to affect archaeological resources, including human remains, is low. However, as the Indian Valley Campus is considered a culturally sensitive area, the proposed project would be subject to Policy AP 6580 of the Marin Community College District Administrative Procedures, which includes procedures and practices that the campus requires all construction contractors to implement in order to protect archaeological resources, including human remains, from inadvertent damage. As a result, the impact to unknown archaeological resources, including human remains, would be a less than significant.

c) ***Less than Significant Impact with Mitigation.*** The Indian Valley Campus is underlain by Quaternary-aged alluvial deposits (COM 2007). Geologic formations, including various Quaternary subunits have a high to moderate potential for paleontological resources. Therefore, excavation on the project sites could potentially inadvertently unearth and damage paleontological resources. Impacts to paleontological resources would be potentially significant. **Mitigation Measure CUL-1** would be implemented to reduce the impact on paleontological resources to a less than significant level.

> **Mitigation Measure CUL-1:** Prior to project construction, construction personnel shall be informed of the potential for encountering significant paleontological resources. All construction personnel shall be informed of the need to stop work in the vicinity of a potential discovery until a qualified paleontologist has been provided the opportunity to assess the significance of the find and implement appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed of the requirements that unauthorized collection of resources is prohibited.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP could adversely affect cultural resources on campus. Each project would adhere to Policy AP 6580 and would undergo additional environmental review when they are scheduled to be constructed, and if required, mitigation would be provided to reduce impacts related to cultural resources. As discussed above, with adherence to Policy AP 6580 and mitigation, the proposed project would have less than significant project-level impacts with respect to cultural resources. Therefore, the contribution of the proposed project to the cumulative impact on cultural resources located on campus would not be cumulatively considerable.

Anticipated future development in some portions of Novato has the potential to adversely affect cultural resources in the City. However, numerous federal and State laws, regulations, and statues seek to protect cultural resources, and these would apply to all development within the City. In addition, the current *City of Novato General Plan* and the *Draft City of Novato General Plan 2035* include policies for the protection of cultural resources from unnecessary impacts. As discussed above, with adherence to Policy AP 6580 and mitigation, the proposed project would have less than significant project-level impacts on cultural resources. Therefore, the contribution of the proposed project to the cumulative impact on cultural resources in the city would not be cumulatively considerable.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
6. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	■
ii) Strong seismic ground shaking?	☐	☐	■	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
iv) Landslides?	☐	☐	☐	■
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	■	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) (California Building Code), creating substantial risks to life or property?	☐	☐	■	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	■

Environmental Setting

The San Francisco Bay Area is a seismically active region and there are three major faults in the vicinity of the Indian Valley Campus. The campus is located within Seismic Zone 4 of the California Building Code,

which is considered to be the most seismically-active zone. The San Andreas fault runs approximately 10 miles southwest of the campus, Rodgers Creek fault is 9 miles to the north of the campus and Hayward fault passes approximately 11 miles to the east. The Napa and Concord- Green Valley faults are also in the surrounding area. However, there are no known active faults on the campus itself and it is not within an Alquist-Priolo Earthquake Fault Zone (DOC 2010).

The soils on the campus are mostly made of up Tocaloma-Saurin association and Tocaloma-McMullin complex. These soils are common in hilly areas and consist of loam on top of weathered bedrock. The soils are well-drained and do not contain expansive clay soils and have very low susceptibility to hazards such as liquefaction and densification. Saurin-Bonnydoon complex and Xerorthents- Urban land complex is also present on the campus (NRCS 2017).

Discussion of Potential Project Impacts

a)(i) ***No Impact.*** None of the project sites are located within an Alquist-Priolo Earthquake Fault Zone, and while the improvements to be constructed under the proposed project would be located in a seismically active region, there are no known active faults crossing the campus (COM 2007). For these reasons, the proposed project would not expose people or structures to adverse effects involving rupture of a known earthquake fault. There would be no impact with respect to this criterion.

a)(ii) ***Less than Significant Impact.*** Due to the seismically-active nature of the San Francisco Bay Area, the campus will likely experience strong seismically-induced ground shaking within the design life of the improvements to be constructed under the proposed project. The proposed structures would be designed and constructed in accordance with the California Building Code (CBC) and adhere to all applicable standards regarding structural engineering and seismic safety. With proper design and construction, the proposed project would not expose people or structures to adverse effects involving strong seismic ground shaking. This impact is considered less than significant.

a)(iii) ***Less than Significant Impact.*** Liquefaction is the temporary transformation of saturated and very low cohesion or cohesion-less soils into a viscous liquid as a result of ground shaking. The susceptibility of liquefaction on the Indian Valley Campus is very low due to the underlying materials (COM 2007). Therefore, the proposed project would not expose people or structures to adverse effects involving seismic-related ground failure, including liquefaction. This impact is considered less than significant.

a)(iv) ***No Impact.*** Active landslides have been mapped in the surrounding area, over 1,000 feet away from the Indian Valley Campus. Along the south of the campus, the perimeter road is the only existing facility that has been previously identified as having the potential to be affected by landslides (COM 2007). As the project sites are not located adjacent to or in the vicinity of the perimeter road, the sites would not be affected by landslide hazards. Therefore, the proposed project would not expose people or structures to adverse effects involving landslides. There would be no impact with respect to this criterion.

b) ***Less than Significant Impact.*** Construction of the proposed project would require grading and excavation, which would expose soil to erosion, and off-site sedimentation from the project sites could adversely affect Ignacio Creek. An Erosion and Sediment Control Plan would be prepared and implemented for each improvement that is currently proposed. Each plan would include measures to control on-site erosion and off-site sedimentation. In addition, each plan would include measures to keep construction pollutants from coming into contact with storm water. With these plans in place, impacts related to substantial soil erosion is expected to be less than significant.

c) ***Less than Significant Impact.*** Issues related to seismically induced and non-seismic landslide hazards are discussed in response to **Item 6(a)(iv)**, above. Issues related to liquefaction and related hazards are discussed in response to **Item 6(a)(iii)**, above. Issues related to soil properties are discussed in response to **Item 6(d)**, below. Construction of the proposed project would require shallow excavation. Excavated (cut) slopes could be unstable and subject to failure over the short term if they are improperly designed or implemented. However, as identified above, development would be designed and constructed in accordance with the current CBC, which includes provisions that specifically address good grading practices and cut and fill slope stability. Impacts related to unstable cut or fill slopes are therefore expected to be less than significant.

d) ***Less than Significant Impact.*** Geologic maps of the campus show that expansive clays and soils with high plasticity are not included in campus geology. However, soil borings taken near the location of the proposed outdoor amphitheater found the presence of medium expansive soils (COM 2007). As discussed above, the proposed project will adhere to the current CBC, which includes detailed provisions to ensure that the design of new facilities is appropriate to site soil conditions, including requirements to address expansive and otherwise problematic soils. With adherence to CBC, impacts related to site soil conditions—including but not limited to expansive soils, if any are present—would be less than significant.

e) ***No Impact.*** The proposed project would not involve the installation of septic tanks or alternative wastewater disposal systems. There would be no impact with regard to this criterion.

Discussion of Potential Cumulative Impacts

Most geologic impacts such as those related to risk from faults, liquefaction potential, slope stability, landslide potential, expansive and compressible soils are site specific and do not cumulate. Therefore, improvement projects listed in the 2016-2021 FMP, including the improvements to be constructed under the proposed project, and projects in the City of Novato would not result in a significant cumulative impact related to geologic risks. The one area where the impacts of the proposed project may cumulate with other projects on campus and in the city is related to soil erosion and discharge of sediment into receiving waters during construction. The proposed project would implement erosion and sediment control plans during construction. Furthermore, the remaining improvement projects listed in the 2016-2021 FMP are not scheduled for construction at this time and there are no planned or recently approved off-site developments within the immediate vicinity of the campus. The closest planned or recently approved project in the City of Novato is the Oakmont Senior Living project, located over one mile to the north of the campus at 1461 South Novato Boulevard. As a result, the proposed project would not combine with other planned or recently approved projects on campus or in the city to negatively affect water quality from erosion and sedimentation, and no cumulative impact with respect to soil erosion would occur.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
7. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	■	☐

Environmental Setting

General

Global climate change refers to any significant change in climate measurements, such as temperature, precipitation, or wind, lasting for an extended period (i.e., decades or longer) (U.S. EPA 2014). Climate change may result from:

- natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- natural processes within the climate system (e.g., changes in ocean circulation, reduction in sunlight from the addition of greenhouse gas (GHG) and other gases to the atmosphere from volcanic eruptions); and
- human activities that change the atmosphere's composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, desertification).

The primary change in global climate has been a rise in the average global tropospheric temperature of 0.2 degree Celsius per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling using 2000 emission rates shows that further warming is likely to occur, which would induce further changes in the global climate system during the current century (IPCC 2007). Changes to the global climate system and ecosystems, and to California, could include declining sea ice and mountain snowpack levels, rising average global sea levels, and many other potentially severe problems (IPCC 2007).

The natural process through which heat is retained in the troposphere[3] is called the "greenhouse effect." The greenhouse effect traps heat in the troposphere through a threefold process as follows: (1) short-wave radiation in the form of visible light emitted by the Sun is absorbed by the Earth as heat; (2) long-wave

3 The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface to 10 to 12 kilometers).

radiation is re-emitted by the Earth; and (3) GHGs in the upper atmosphere absorb or trap the long-wave radiation and re-emit it back towards the Earth and into space. This third process is the focus of current climate change actions.

While water vapor and carbon dioxide (CO_2) are the most abundant GHGs, other trace GHGs have a greater ability to absorb and re-radiate long-wave radiation. To gauge the potency of GHGs, scientists have established a Global Warming Potential (GWP) for each GHG based on its ability to absorb and re-emit long-wave radiation over a specific period. The GWP of a gas is determined using carbon dioxide (CO_2) as the reference gas, which has a GWP of 1 over 100 years (IPCC 1996).[4] For example, a gas with a GWP of 10 is 10 times more potent than CO_2 over 100 years. The use of GWP allows GHG emissions to be reported using CO_2 as a baseline. The sum of each GHG multiplied by its associated GWP is referred to as "carbon dioxide equivalent" (CO_2e). This essentially means that 1 metric ton of a GHG with a GWP of 10 has the same climate change impacts as 10 metric tons of CO_2.

Regulatory Setting

In 2005, in recognition of California's vulnerability to the effects of climate change, then-Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 $MMTCO_2e$); by 2020, reduce emissions to 1990 levels (estimated at 427 $MMTCO_2e$); and by 2050 reduce statewide GHG emissions to 80 percent below 1990 levels (approximately 85 $MMTCO_2e$).

In response, the California legislature passed Assembly Bill No. 32 in 2006 (California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), also known as the Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction from forecast emission levels) (OPR 2008).

Pursuant to AB 32, ARB adopted a Scoping Plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. Assembly Bill 32 (AB 32) *Climate Change Scoping Plan* indicates how reductions in significant GHG sources will be achieved through regulations, market mechanisms, and other actions. The AB 32 Scoping Plan recommendations are intended to curb projected business-as-usual growth in GHG emissions and reduce those emissions to 1990 levels.

In 2015 and 2016, additional laws were enacted setting GHG reduction targets for the state of California for years beyond 2020. In April 2015, Governor Brown Jr. issued an executive order to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. In October 2015, Senate Bill 350 (SB 350) was signed into law, establishing new clean energy, clean air and greenhouse gas reduction goals for 2030 and beyond. Building off of AB 32, SB 350 established California's 2030 greenhouse gas reduction target of 40 percent below 1990 levels. In August 2016, Senate Bill 32 (SB 32) was signed into law which requires CARB to adopt rules and regulations to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

---

4 All Global Warming Potentials are given as 100-year values.

Discussion of Potential Project Impacts

a) ***Less than Significant Impact***. Implementation of the proposed project would result in small increases of GHG emissions that are associated with global climate change. Estimated GHG emissions attributable to the proposed project would be primarily associated with short-term, temporary increases of CO_2 from mobile sources including construction haul trucks (to off-haul excavated materials), and equipment used during the construction of the proposed project. There would be minimal operational GHG emissions for the reasons presented below.

Construction

During construction and demolition activities, GHGs would be emitted from the operation of construction equipment and from construction worker vehicles and haul truck trips to and from the campus. GHG emissions during construction were estimated using the CalEEMod model. Based on CalEEMod, construction activities on the project sites would generate approximately 136.56 $MTCO_2e$. There are no quantitative thresholds put forth by the BAAQMD for the evaluation of the significance of a project's construction emissions. However, these estimated one-time emissions are lower than the 1,100 $MTCO_2e$ threshold that is put forth by the BAAQMD for the evaluation of the impact from a project's operation emissions. Therefore, the emissions are considered too small to result in a significant impact on global climate. The impact from the construction-phase GHG emissions associated with the proposed project would be less than significant.

Operation

The proposed project would serve the existing student population on the Indian Valley Campus and thus would not induce population growth in the City of Novato. As a result, operation of the proposed project would not generate new trips to the campus. As a result, the proposed project would not increase GHG emissions, and no impact with regards to GHG emissions during operation would occur.

b) ***Less than Significant Impact***. The proposed project would result in a minimal increase in GHG emissions, as described above. Therefore, the proposed project would not conflict with AB 32 or other state laws and regulations related to GHG emissions and the impact would be less than significant.

Discussion of Potential Cumulative Impacts

As the impact of the project's GHG emissions is essentially a cumulative impact, the analysis presented above provides an adequate analysis of the proposed project's cumulative impacts related to GHG emissions.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
8. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	■	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	■	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	■	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	■
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	■
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	■
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	■	☐

Environmental Setting

The California Department of Toxic Substance Control (DTSC) and the State Water Quality Regional Control Board (SWQRCB) maintain updated maps of hazardous materials sites. The Indian Valley Campus and surrounding zip code area are not included on either web database. Hazards on the campus primarily comprise the maintenance supplies used on the campus and hazardous materials such as lead-containing paint and asbestos-containing materials that may be present in buildings. There were six underground storage tanks (USTs) on the Indian Valley Campus. In 1989 and 1991, four tanks were removed around the Pomo Cluster, three contained gasoline and the fourth was a waste oil tank. Sampling in the area beneath the gasoline tanks showed only minor amounts of petroleum hydrocarbons but contamination was present down to 7 feet. Another large gas tank was located at the corporation yard and was removed in 1991. In 1993, a large diesel fuel tank was removed near the swimming pool complex. There were no measurable contaminants at the site or adjacent areas after either tank was removed (COM 2007).

There is one aboveground storage tank, situated in a code-compliant, double-walled containment system, located near the corporation yard. There may be PCBs in the hydraulic fluid in hydraulic lifts and elevators across the campus, although these materials do not pose a hazard to humans. Additional hazardous material risks may occur from the collection and disposal of hazardous materials during building renovations and/or daily campus operation.

Discussion of Potential Project Impacts

a-b) ***Less than Significant Impact with Mitigation***. There are no known environmental hazards on the campus. Operation of the amphitheater and the classroom complex at the organic farm would not involve the routine use, storage, transport, and disposal of hazardous materials in any significant quantities. Small quantities of hazardous materials would potentially be used on the project sites during construction activities. All activities would comply with state and federal hazard and hazardous material regulations, thus the risk associated with the routine handling, transport, use, and disposal of hazardous materials would be minimal.

Asbestos containing materials (ACM) and lead-based paint (LBP) may be present in some of the buildings on the campus due to their age. Other hazardous materials that are commonly found in building materials include fluorescent lighting, electrical switches, heating/cooling equipment, and thermostats that can contain hazardous materials. While Building 19 has already been abated for hazardous materials, these materials are most likely present in Building 20 and the warehouse in Parking Lot No. 6. During demolition, hazardous materials in these structures may pose a health risk if not handled and disposed of properly. This represents a potentially significant impact. However, with the implementation of

Mitigation Measure HAZ-1, which requires that ACM, LBP, and other hazardous materials be abated prior to demolition, this impact would be reduced to a less than significant level.

> **Mitigation Measure HAZ-1**: Prior to demolition of Building 20 and the warehouse building in Parking Lot No. 6, asbestos containing materials (ACM), lead-based paint (LBP), and other hazardous materials shall be removed using proper techniques in compliance with all applicable State and federal regulations, including the BAAQMD rule related to asbestos.

c) ***Less than Significant Impact.*** San Jose Middle School is the nearest school to the Indian Valley campus and is located approximately 1,350 feet (0.25 mile) to the east of the closest project site (amphitheater). However, the proposed amphitheater would not involve handling of hazardous or acutely hazardous materials, substances, or waste. Therefore, *less than significant* impacts would occur.

d) ***No Impact.*** According to CERCLIS, Geotracker, and EnviroStor database searches for known hazardous materials contamination, conducted on May 4, 2017, the project sites are not located on a property associated with a hazardous site listed under Government Code Section 65962.5, also known as the Cortese List (DTSC 2017). As a result, the proposed project would not create a significant hazard to the public or the environment associated with a hazardous site listed under Government Code Section 65962.5. There would be no impact with regard to this criterion.

e-f) ***No Impact.*** The campus is not located within 2 miles of an airport or private airstrip. The nearest airport is the Gnoss Field Airport, approximately 4.7 miles north of the campus. As such, there would be no impact with regard to these criteria.

g) ***No Impact.*** The campus police have developed emergency response plans, including an Emergency Operations Plan as well as other emergency or hazard response plans. Construction of the improvement projects would occur within the boundary of the campus, and street closures during project construction are not anticipated. Therefore, the project would not impede any emergency routes and there would be no impact with regard to this criterion.

h) ***Less than Significant Impact.*** The campus is located in a Moderate Fire Hazard Severity Zone area and is designated as a Local Responsibility Area (CalFire 2007). All of the structures would be built according to the Fire Code and National Fire Protection Agency requirements and would be inspected by the DSA for conformance. Additionally, the location of the project sites on the campus is not directly adjacent to wildlands so the spreading of a potential fire is unlikely. Due to the small scale of the improvement projects and adherence to applicable building regulations, impacts regarding wildland fires would be less than significant.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP have the potential to expose the public and the environment to risks associated with hazards and hazardous materials. Each project would undergo additional environmental review when they are scheduled to be constructed, and if required, mitigation would be provided to reduce impacts related to hazards and hazardous materials. Furthermore, as discussed above, with mitigation, the proposed project would have less than significant project-level impacts with respect to hazards and hazardous materials. Therefore, the contribution of the proposed project to the cumulative impact related to hazards and hazardous materials on campus would not be cumulatively considerable.

There are no planned or recently approved off-site developments within the immediate vicinity of the campus. The closest planned or recently approved project in the City of Novato is the Oakmont Senior Living project, located over one mile to the north of the campus at 1461 South Novato Boulevard. As a result, the proposed project would not combine with other planned or recently approved projects in the city to create a significant hazard to the public or the environment with respective to the use or accidental release of hazardous materials. In addition, the proposed improvements would not combine with other planned or recently approved projects in the city to expose people to aircraft safety hazards, impair the implementation of an adopted emergency response plan or emergency evacuation plan, and expose people or structures to a significant risk of loss, injury, or death involving wildland fires. There would be no cumulative impact with regard to hazards and hazardous materials.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
9. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	■	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	■	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?	☐	☐	■	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	☐	☐	■	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	■	☐
f) Otherwise substantially degrade water quality?	☐	☐	■	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	■
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	■

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	■
j) Inundate by seiche, tsunami, or mudflow?	☐	☐	☐	■

Environmental Setting

The Indian Valley Campus is located within the Novato Creek watershed. Ignacio Creek runs parallel to Ignacio Boulevard across the full length of the campus. Approximately 0.8 miles southeast of the campus, Ignacio Creek converges with Arroyo San Jose before joining Novato Creek, which flows into San Pablo Bay. Throughout the campus, a concrete pipe storm drain system collects the runoff and directs flows into Ignacio Creek. Parking lot runoff also enters the creek via small pipe drop inlets and pipelines. Flows from the northern part of the campus flow in a large pipe under Ignacio Boulevard, Parking Lot 2, and a residential neighborhood before discharging into the creek downstream of the campus (COM 2007).

The campus is underlain by the Novato Valley Basin. A shallow groundwater table runs roughly parallel to Ignacio Creek and numerous seeps are found between the overlaying sediment and bedrock in the creek channel. On the campus, water quality in Ignacio Creek is good but worsens downstream of the college. Runoff from campus parking lots and residential subdivisions contribute oils, herbicides and pesticides, heavy metals, etc. to the creek. Diazinon is a pesticide used in landscape areas and is found in detrimental levels in Novato Creek (COM 2007).

The campus is not located within a 100-year flood zone. The campus is located within Flood Zone X, which is defined as an area of minimal flood hazard, usually above the 500-year flood level (FEMA 2017).

Discussion of Potential Project Impacts

a, f) ***Less than Significant Impact.*** During construction of the proposed project, there is a potential for increased erosion, sedimentation, and discharge of polluted runoff from the project sites. However, as identified in response to Geology and Soils **Item 6(b)**, an Erosion and Sediment Control Plan would be prepared and implemented for each improvement project, which would include measures to control on-site erosion and off-site sedimentation. As a result, development of the proposed project would not result in storm water discharges that would violate water quality standards or waste discharge requirements during construction, and this impact would be less than significant.

The proposed outdoor amphitheater would add approximately 4,100 square feet of impervious surfaces to the campus while the amount the amount of impervious surfaces associated with proposed organic farm improvements would remain the same. In addition, demolition of Building 20 in the Ohlone Cluster would decrease the amount of impervious surface on the campus as the foundation would be removed. During operation, run-off from the project sites would be routed to the College's storm drain system and into Ignacio Creek. This drainage is subject to requirements listed in provision C.3 of the San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (Regional Water Quality Board Order R2-

2009-0074; and Order R2-2011-0083). This permit requires permittees to comply with the discharge prohibitions and receiving water limitations through the timely implementation of control measures and other actions as specified in the permit (San Francisco Bay RWQCB 2009). Development on the campus would be required by law to comply with applicable NPDES requirements for stormwater quality. Therefore, operation of the proposed project would not result in any storm water discharges that would violate water quality standards or waste discharge requirements, and this impact would be less than significant.

b) ***Less than Significant Impact.*** The project would not use groundwater as a source of supply. Natural recharge in the basin occurs principally as infiltration from streambeds that flow from the upland areas within the drainage basin and from direct percolation of precipitation that falls on the basin floor (DWR 2004). Development of the proposed outdoor amphitheater would result in the addition of approximately 4,100 square feet of new impervious surfaces on the campus as the seating area would consist largely of a lawn while the development of the proposed organic farm improvements and demolition of buildings in the Ohlone Cluster would decrease the amount of impervious surfaces on the campus. As the increase in impervious surface on campus would be small, there would not be a substantial reduction in the amount of land available for groundwater recharge. The impact would be less than significant.

c) ***Less than Significant Impact.*** Storm water generated on the site of the individual improvement projects would be directed toward existing storm drainage facilities serving the campus. As discussed in response to **Item 6(a)** above, the proposed project would be required to control soil erosion or siltation during construction through the preparation and implementation of Erosion and Sediment Control Plans. Implementation of the plans would reduce the potential for erosion on the project sites and minimize the discharge of sediment into the storm drain system. Due to the small nature of the improvements to be constructed under the proposed project and given that a majority of the organic farm improvements would take place in areas that have been previously disturbed and paved, existing drainage on the campus would be sufficient to handle increased stormwater flows. As such, the existing drainage pattern of the area and the courses of any streams or creeks in the area would not be affected. Therefore, the impact on drainage patterns resulting in substantial erosion would be less than significant.

d) ***Less than Significant Impact.*** The proposed outdoor amphitheater project would result in a slight increase in the amount of impervious surfaces on the site and thus would increase the volume of runoff generated at this location. The proposed organic farm improvements and the demolition of buildings in the Ohlone Cluster would decrease the amount of impervious surfaces at these locations and thus would not increase the volume of runoff. As the amount of impervious surface added by the proposed amphitheater would be small, relative to the ground cover of the entire campus, no increased flooding hazards are anticipated, and the impact would be less than significant.

e) ***Less than Significant Impact*** As discussed in response to **Items 9(c–d)**, above, the amount of impervious surfaces added to the campus would be small, and thus would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. See response to **Item 9(a)**, above, with regard to water quality. The proposed project would not provide substantial additional sources of polluted runoff. Therefore, this impact is considered less than significant.

g-h) ***No Impact***. The campus is not located within a 100-year flood zone. As a result, development of the proposed project would not place housing or structures within an area at risk of flood flows. There would be no impact with regard to these criteria.

i) ***No Impact***. The closest dam to the Indian Valley Campus is Novato Creek Dam, located approximately 4.5 miles to the northwest of the campus on Stafford Lake. The campus is not located within the inundation area for the Novato Creek Dam or any other dam. Therefore, development of the proposed project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. There would be no impact with regard to this criterion.

j) ***No Impact***. The campus is located well inland from the San Francisco Bay and no bodies of water are located in the vicinity of the site. As a result, the campus is not at risk of seiche or tsunami inundation. As discussed above, active landslides have been mapped in the surrounding area, over 1,000 feet away from the Indian Valley Campus. Along the south of the campus, the perimeter road would be the only facility that could potentially be affected by landslides. As the improvement projects are not located adjacent to or in the vicinity of the perimeter road, they would not be affected by landslide hazards, including mudflows. There would be no impact with respect to this criterion.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP could adversely affect hydrology and water quality on campus. Each project would undergo additional environmental review when they are scheduled to be constructed, and if required, mitigation would be provided to reduce impacts related hydrology and water quality. As discussed above, the proposed project would have less than significant project-level impacts with respect to hydrology and water quality. Therefore, the contribution of the proposed project to the cumulative impact related to hydrology and water quality on campus would not be cumulatively considerable.

There are no planned or recently approved off-site developments within the immediate vicinity of the campus. The closest planned or recently approved project in the City of Novato is the Oakmont Senior Living project, located over one mile to the north of the campus at 1461 South Novato Boulevard. As a result, the proposed project would not combine with other planned or recently approved projects in the City to negatively affect water quality, groundwater supplies, and existing drainage patterns. In addition, the proposed improvements would not combine with other planned or recently approved projects in the city to place housing or structures with a 100-year flood hazard area or expose people or structures to significant risk involving the failure of a levee or dam and inundation by a seiche, tsunami, or mudflow. There would be no cumulative impact with regard to hydrology and water quality.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
10. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	■
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	■
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	■

Environmental Setting

The Indian Valley Campus has been an educational facility since the 1970s and is designated "Community Facility" in the *City of Novato General Plan (1996)*. The property is also zoned Community Facility, which allows for public use buildings, government offices, schools, and other municipal uses. The College is constitutionally exempt from local land use regulations whenever using property under its control in furtherance of its educational purposes. However, the use of the campus as a community college is consistent with the City's general plan and zoning designations. Surrounding land uses consist of a dense residential area to the east and open space consisting of steep hillsides covered in chaparral and oak woodlands to the north, west and south.

Discussion of Potential Project Impacts

a) ***No Impact***. There is no established community located on the Indian Valley Campus. The improvements to be constructed under the proposed project are located within the campus core, and construction would not involve the vacation of any public areas or streets. For these reasons, the proposed project would not physically divide an established community. There would be no impact with regard to this criterion.

b) ***No Impact.*** As stated above, the Indian Valley Campus is designated "Community Facility" in the *City of Novato General Plan (1996)* and zoning code. The proposed project would further the educational mission of the Indian Valley Campus and would not involve a land use change. There would be no impact with regard to this criterion.

c) ***No Impact.*** The improvements to be constructed under the proposed project are not located within a habitat conservation plan or natural community conservation plan. There would be no impact with regard to this criterion.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP would be consistent with the existing land uses on campus setting, and thus when combined with the improvements to be constructed under the proposed project, would not result in adverse effects with regard to land use. As a result, the cumulative impact of campus development with respect to land use and planning would be less than significant.

Anticipated future development in the City of Novato would be reviewed for consistency with adopted land use plans and policies by the City. For this reason, pending and approved projects are anticipated to be consistent with the General Plan and zoning requirements, or be subject to an allowable exception, and further, would be subject to review under CEQA, mitigation requirements, and design review. As the proposed project would be consistent with the General Plan designations for the Indian Valley Campus, the cumulative impact of the proposed project and future development in the city would be less than significant.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
11. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	■

Relevant Elements of the Project and its Setting

According to the *Draft City of Novato General Plan 2035,* there are four state-designated mineral resource sectors (MRZ-2 zones) located in the Novato area. Three of these sectors - Rush Creek Open Space preserve, the Black Point area, and Burdell Mountain – are located in the northern half of the city while the other sector – Bowman Canyon – is located just outside the city's northwestern boundary (City of Novato 2016). None of these mineral resource sectors are located on or in the vicinity of the Indian Valley Campus.

Discussion of Potential Project Impacts

a–b) ***No Impact.*** No known or potential mineral resources have been identified on the Indian Valley Campus. In addition, existing zoning and land uses preclude the use of the campus for mineral extraction (for example, sand, and gravel). Therefore, construction of the proposed project would not impede extraction or result in the loss of availability of a known mineral resource. There would be no impacts with regard to these criteria.

Discussion of Potential Cumulative Impacts

As discussed above, there are four state-designated mineral resource sectors located in the Novato area. Three of these sectors are designated as open space in the *Draft City of Novato General Plan 2035* and the *Marin County General Plan*. As a result, they are protected from future development in the City and County. The last sector – the Black Point area – is designated for low density residential development in the *Draft City of Novato General Plan 2035*, and future development on this site would result in the loss of availability of a known mineral resource. However, as no known or potential mineral resources have been identified on the Indian Valley Campus, construction of the improvement projects listed in the 2016-2021 FMP, including the improvements to be constructed under the proposed project, would not contribute to the loss in availability of a known mineral resource. The project's cumulative impact would be less than significant.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
12. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies?	☐	☐	■	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	■	☐
d A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project (including construction)?	☐	■	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■

Environmental Setting

Noise Fundamentals

When assessing community reaction to noise, there is an obvious need for a scale that averages varying noise exposures over time and that quantifies the result in terms of a single number descriptor. Several scales have been developed that address community noise level. Those that are applicable to this analysis are the Equivalent Noise Level (Leq), Maximum Noise Level (Lmax), the Day-Night Noise Level (Ldn or DNL), and the Community Noise Equivalent Level (CNEL).

- Leq is the average A-weighted sound level measured over a given time interval. Leq can be measured over any period, but is typically measured for 1-minute, 15-minute, 1-hour, or 24-hour periods.

- Lmax is the single highest sampled level of sound.
- Ldn or DNL is a 24-hour Leq with a "penalty" of 10 dB added during the nighttime hours (10:00 PM to 7:00 AM), which is normally sleeping time.
- CNEL is another average A-weighted sound level measured over a 24-hour period. However, the CNEL noise scale is adjusted to account for the increased sensitivity of some individuals to noise levels during the evening as well as the nighttime hours. A CNEL noise measurement is obtained after adding a "penalty" of 5 dB to sound levels occurring during the evening from 7:00 PM to 10:00 PM, and a penalty of 10 dB to sound levels occurring during the nighttime from 10:00 PM to 7:00 AM.[5]

Existing Noise Environment

The Indian Valley Campus is in a relatively quiet area with primary ambient noise levels resulting from occasional traffic, natural sounds (water, birds, wind), and activities on the campus. Ambient noise levels on the campus ranged from 47 to 50 dB(A) Ldn in 2007 (COM 2007), and are not substantially higher at this time.

Noise Sensitive Land Uses

Noise-sensitive land uses include residences, hospitals, schools, libraries, places of worship, parks, and assisted-living centers. The nearest on-site noise-sensitive land uses are classroom buildings in the campus core while the nearest off-site noise-sensitive land uses are residences and a middle school, which are located approximately 900 feet and 1,350 feet, respectively, to the east of the closest project site (amphitheater).

Discussion of Potential Project Impacts

a) ***Less than Significant Impact.*** According to the State Land Use Compatibility Guidelines for Noise, exterior noise levels up to 70 dB(A) CNEL are "normally acceptable" for school uses. The most recent noise level readings were conducted in 2007, with a sound level measurement of approximately 47 to 50 dB(A) Ldn. As noted above, according to the State Land Use Compatibility Guidelines, sound levels at school land uses are normally acceptable up to 70 dB(A) CNEL. Enrollment on campus during the 2006-07 school year when the noise measurements mentioned above were taken was approximately 970 students. As discussed above, in Spring 2015 the campus had an enrollment of about 1,150 students. Given that campus enrollment has not substantially increased since 2007 and the location of the project in a suburban setting, ambient sound levels are not anticipated to exceed that of a typical school land use.

The proposed project could introduce some sound level increases from HVAC equipment and amphitheater operations. However, as discussed in more detail below, the improvements to be constructed under the proposed project are compatible with the existing uses on the campus, and are not expected to increase noise levels on the campus substantially. The proposed project is not expected to

---

5 The logarithmic effect of adding these penalties to the peak-hour Leq measurement results in a CNEL measurement that is within approximately 3 dB(A) (plus or minus) of the peak-hour Leq. California Department of Transportation, *Technical Noise Supplement: A Technical Supplement to the Traffic Noise Analysis Protocol*, October 1998, pp. N51-N54.

increase noise to such an extent that exterior noise levels at nearby classroom buildings on campus would exceed the 70 db(A) CNEL standard established by the State. For these reasons, the proposed project would not expose persons to or generate noise levels in excess of established standards, and this impact is considered less than significant.

b) ***Less than Significant Impact.*** Construction of the proposed project would not require pile-driving, blasting, or other activities that could cause substantial groundborne vibration or noise. Project construction activities would include the use of tractors, loaders, excavators, graders, which are not sources of significant groundborne vibration or noise. Furthermore, the closest project site (amphitheater) is more than 900 feet from the nearest off-site receptor. Haul trucks could result in some level of vibration while hauling materials off-site. However, the vibrations would be in the range that is experienced in urban areas from truck movement, and the duration of construction for each project is short (on the order of 3 to 4 months). Therefore, the impact would be less than significant.

c) ***Less than Significant Impact.*** The proposed project would serve the existing student population on the Indian Valley Campus and would not induce population growth in the City of Novato or elsewhere in Marin County. As a result, operation of the proposed project would not generate new trips to campus. As a result, the proposed project would not result in a permanent increase in noise levels due to vehicle trips, and no impact would occur.

The organic farm classroom complex would include new stationary sources of noise such as mechanical HVAC equipment, which could generate noise levels that average 69 to 73 dB(A) CNEL at 50 feet when the equipment is operating. Sound generated by a point source typically attenuates at a rate of 6.0 dB(A) for each doubling of distance from the source to the receptor. Thus, at 100 feet, new stationary equipment would average 63 to 67 dB(A) CNEL, while at 200 feet new stationary equipment would average 57 to 61 dB(A) CNEL. The nearest classroom building to the classroom complex and expanded parking lot is located over 1,000 feet to the southeast. At this distance the noise levels at this sensitive receptor from mechanical HVAC equipment would average from under 45 to 49 dB(A) CNEL, which are below existing noise levels on the campus. Therefore, the proposed project would not result in a substantial permanent increase in noise levels due to stationary sources, and this impact would be less than significant.

The proposed project includes the construction and operation of an acoustic (no electronic sound amplification) amphitheater. The amphitheater would be utilized by the existing student body. The reference noise level for a normal speaking voice ranges from approximately 65 to 70 dB(A) Leq at 3 feet (Caltrans 2013). As noted above, sound typically attenuates at a rate of 6 dB(A) for each doubling of distance from the source to receptor. Thus, a noise level of 75 dB(A) Leq at 3 feet would decrease to approximately 50 dB(A) Leq at 50 feet. The nearest classroom building to the amphitheater is approximately 100 feet to the south in the Pomo Cluster. At this distance the noise levels at this sensitive receptor from speaking voices would be approximately 44 dB(A) Leq, which are below existing noise levels on the campus. Thus, sound generated by voices in the amphitheater is not anticipated to cause a significant noise level increase at any nearby sensitive receptors, or result in sound levels exceeding State Land Use Compatibility Guidelines. Further, the voice of performers at the amphitheater would project towards the audience which will be seated on an upward sloping hill. Both the audience seating area and incline would provide further attenuation of potential noise level increases. Therefore, the proposed project would not result in a substantial permanent increase in noise levels due to stationary sources, and this impact would be less than significant.

d) ***Less than Significant Impact with Mitigation.*** Noise impacts resulting from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise generating activities, and the distance and shielding between construction noise sources and noise sensitive areas. **Table 2, Construction Equipment Noise Emission Levels,** summarizes noise levels produced by commonly used construction equipment. Individual types of construction equipment are expected to generate noise levels ranging from 74 to 89 dB(A) at a distance of 50 feet.

Table 2
Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level (dB(A)) 50 feet from Source
Pile Driver	101
Grader	85
Bulldozers	85
Truck	88
Loader	85
Roller	74
Air Compressor	81
Backhoe	80
Pneumatic Tool	85
Paver	89
Concrete Pump	82

Source: Federal Transit Administration 2006.

Noise generated during construction of the proposed project is anticipated to be the greatest during ground disturbance activities, such as excavation and grading, and demolition activities. Maximum noise levels would typically range from of 70 to 90 dB(A) during ground disturbance activities. Hourly average construction noise levels are typically 75 dB(A) to 85 dB(A) measured at a distance of 50 feet from the center of the site during busy construction periods.

The nearest off-site sensitive receptors include residences and a middle school, which are located approximately 900 feet and 1,350 feet, respectively, to the east of the closest project site (amphitheater). Given that sound generated by a point source, such at a construction site, typically diminishes (attenuates) at a rate of 6.0 dB(A) for each doubling of distance from the source to the receptor at acoustically "hard" sites and 7.5 dB at acoustically "soft" sites (US Department of Transportation 1980a), the residences and the middle school near the site of the proposed outdoor amphitheater could experience maximum noise levels ranging from less than 46 to 66 dB(A) during construction.

The nearest classroom buildings to the site of the proposed amphitheater are located approximately 100 feet to the south and west while the nearest classroom buildings to the buildings proposed for demolition in the Ohlone Cluster are located over 50 feet to the east. In addition, the nearest classroom building to the site of the organic farm classroom complex is located over 1,000 feet to the east. Classroom buildings near the site of the proposed outdoor amphitheater could experience maximum noise levels ranging from 64 to 84 dB(A) during construction while nearest classroom building to the Ohlone cluster could

experience maximum noise levels ranging from 70 to 90 dB(A) during construction. Finally, the classroom building to the east of the site of the proposed organic farm classroom complex could experience maximum noise levels ranging from less than 46 to 66 dB(A) during construction.

The College would implement several mitigation measures that would minimize construction noise impacts to on-campus locations and off-site sensitive receptors. **Mitigation Measure NOI-1a** is proposed to limit construction to the daytime period. **Mitigation Measure NOI-1b** is proposed to further reduce significant noise impacts from construction activities. Given that the noise from construction of the proposed project would be temporary and of short duration (three to four months), that intervening structures and vegetation are located between the project sites and sensitive receptors which would block noise, and that mitigation has been proposed to reduce construction noise to the maximum extent feasible, the impact of construction noise would be reduced to a less than significant level.

Mitigation Measure NOI-1a: Construction activities on the campus shall be restricted to between the hours of 7:00 AM and 5:00 PM on weekdays and Saturdays. No construction shall occur on Sundays and holidays.

Mitigation Measure NOI-1b: Prior to initiation of construction, the College shall approve a construction noise mitigation program including but not limited to the following.

- All noise-producing project equipment and vehicles using internal combustion engines shall be equipped with exhaust mufflers and air-inlet silencers where appropriate, in good operating condition that meet or exceed original factory specification.
- Mobile or fixed "package" equipment (e.g., arc welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.
- All mobile or fixed noise producing equipment used on the project, which is regulated for noise output by local, state or federal agency, shall comply with such regulation while engaged in project-related activities.
- Material stockpiles and mobile equipment staging, construction vehicle parking and maintenance areas shall be located as far as practicable from noise-sensitive land uses.
- Stationary noise sources such as generators or pumps shall be located away from noise-sensitive land uses as feasible.
- The erection of temporary noise barriers shall be considered where project activity is unavoidably close to noise-sensitive receptors.
- Construction vehicle trips shall be routed as far as practical from existing sensitive uses.
- The loudest campus construction activities, such as demolition and pile driving, shall be considered for scheduling during academic breaks when fewer people would be disturbed by construction noise.
- Whenever possible, academic, administrative, and sensitive use areas that will be subject to construction noise shall be informed prior to the start of each construction project.

e-f) ***No Impact.*** The campus is not located within 2 miles of a public or private airport. The nearest airport is the Gnoss Field Airport, approximately 4.7 miles north of the campus. As such, there would be no impact with regard to these criteria.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP could adversely affect noise sensitive receptors on or off campus during construction and operation. Each project would undergo additional environmental review when they are scheduled to be constructed, and if required, mitigation would be provided to reduce impacts related to noise. Furthermore, as discussed above, with mitigation, the proposed improvement project would have less than significant project-level impacts related to noise. Therefore, the contribution of the proposed project to cumulative noise impacts on campus would not be cumulatively considerable.

There are no planned or recently approved off-site developments within the immediate vicinity of the campus. The closest planned or recently approved project in the City of Novato is the Oakmont Senior Living project, located over one mile to the north of the campus at 1461 South Novato Boulevard. As a result, the proposed project would not combine with other planned or recently approved projects in the City to expose persons to or generate noise levels in excess of City standards or expose persons to or generate excessive groundbourne vibration or groundbourne vibration levels. In addition, the proposed improvements would not combine with other planned or recently approved projects in the City to result in a substantial permanent or temporary increase in ambient noise levels in the vicinity of the campus. There would be no cumulative impact with regard to noise.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
13. POPULATION AND HOUSING – Would the Project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	■
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

Environmental Setting

Surrounding land uses consist of a dense residential area to the east and open space consisting of steep hillsides covered in chaparral and oak woodlands to the north, west and south. The Indian Valley Campus is a community college and does not include any housing.

Discussion of Potential Project Impacts

a) ***No Impact.*** The proposed project would serve the existing student population on the Indian Valley Campus and thus would not induce population growth in the City of Novato or other parts of Marin County. Furthermore, there are no housing units or businesses incorporated in the proposed project. As a result, the proposed project would not induce substantial population growth in the area, either directly or indirectly. There would be no impact with regard to this criterion.

b-c) ***No Impact.*** There are no residences or people currently living on the Indian Valley Campus. As a result, the proposed project would not displace any housing or people. There would be no impact with regard to this criterion.

Discussion of Potential Cumulative Impacts

Anticipated future development in some portions of Novato would result in an increase in population throughout the City. The improvement projects listed in the 2016-2021 FMP, including the improvements to be constructed under the proposed project, would serve existing students already utilizing the campus and would not induce pollution growth in the City. Therefore, the contribution of the proposed project to this cumulative impact would not be cumulatively considerable.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
14 PUBLIC SERVICES –				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☐	■
b) Police protection?	☐	☐	☐	■
c) Schools?	☐	☐	☐	■
d) Parks?	☐	☐	☐	■
e) Other public facilities?	☐	☐	☐	■

Environmental Setting

Fire protection and emergency medical services to the campus are provided by the Novato Fire Protection District (NFPD). The NFPD services include but are not limited to structural fire suppression, wildland fire suppression, response to hazardous materials incidents, urban search and rescue, water rescue, vehicle extrication, technical rescue, and basic life support and advanced life support medical services. Police services are provided by the Marin Community College Police Department, which may contract other agencies as needed to augment services.

San Jose Middle School is the nearest school to the Indian Valley Campus, approximately 1,350 feet east along Ignacio Boulevard. Novato High School is also in the vicinity of the campus, about one mile to the north. Also situated north of the site is the Novato library, 2.15 miles from the campus. The South Novato library is approximately 3.2 miles southeast of the campus.

The Indian Valley Preserve borders the northern end of campus. The Josef Hoog Park is the closest to the campus, approximately 0.8 miles southwest. Hillside Park is located just beyond that, approximately 1.1 miles east of the campus, in a residential area.

Discussion of Potential Project Impacts

a) ***No Impact.*** The proposed project would serve the existing student population on the Indian Valley Campus and thus would not induce population growth in the City of Novato or elsewhere in Marin County. Furthermore, all of the proposed structures would be built according to the Fire Code and National Fire Protection Agency requirements and would be inspected by the DSA for conformance. Therefore, construction and operation of the proposed project would not affect NFPD services or

response times. As discussed in the response to **Item 8(h)** above, the Indian Valley Campus is located in a Moderate Fire Hazard Severity Zone and is designated as a Local Responsibility Area. However, as noted above, all of the proposed structures would be built according to the Fire Code and National Fire Protection Agency requirements. Additionally, the project sites are not located directly adjacent to wildlands so the spreading of a potential fire is unlikely. There would be no impact with regard to this criterion.

b-e) ***No Impact.*** The proposed project would serve the existing student population on the Indian Valley Campus and thus would not induce population growth in the City of Novato or elsewhere in Marin County. Therefore, construction and operation of the proposed project would not affect Marin Community College Police Department services or response times. Furthermore, construction and operation of the proposed project would not increase the need for school or park facilities, or other facilities such as public libraries. There would be no impact with regard to these criteria.

Discussion of Potential Cumulative Impacts

Although substantial portions of Novato are built out, future development would increase population in the City, thus resulting in an increase in demand for fire, police, schools, parks, and other public facilities such as libraries. As a result of the increased demand, future growth in the City may require new or physically altered public facilities to accommodate staff and equipment to meet increased demand, the construction of which could cause significant environmental impacts. The improvement projects listed in the 2016-2021 FMP, including the improvements to be constructed under the proposed project, do not include a residential component. As a result, the proposed project would not increase the City's population either directly or indirectly, and thus would not have any direct or indirect impacts on fire, police, schools, parks, or libraries. Therefore, the contribution of the proposed project to this cumulative impact would not be cumulatively considerable.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
15. RECREATION –				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	■

Environmental Setting

Parks and recreation facilities within one mile of the Indian Valley Campus include the Josef Hoog Park and Hillside Park. The Marin Country Club is situated approximately 0.9 miles southeast of the site. The Indian Valley Campus is currently developed with educational facilities and athletic fields.

Discussion of Potential Project Impacts

a-b) ***No Impact.*** The proposed project does not include the construction or expansion of recreational facilities. In addition, due to the nature of the proposed project, their implementation would not induce population growth that would increase demand for recreational facilities. As a result there would be no deterioration of nearby recreational facilities. There would be no impact with regard to these criteria

Discussion of Potential Cumulative Impacts

Anticipated future development in Novato would increase the extent of development in the City, thus resulting in a cumulative increase in the use of recreational facilities. As a result, future growth in the City may cause substantial physical deterioration of recreational facilities to occur or be accelerated, or may require the construction or expansion of recreational facilities, the construction of which could cause significant environmental impacts. No residential population is associated with the improvement projects listed in the 2016-2021 FMP, including the improvements to be constructed under the proposed project. As a result, the proposed project would not require parks or other City recreational facilities. In addition, no public parks or recreational facilities would be constructed as part of the proposed project. Therefore, the contribution of the proposed project to this cumulative impact would not be cumulatively considerable.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
16. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	■
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	■
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	■
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	■
e) Result in inadequate emergency access?	☐	☐	☐	■
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	■

Environmental Setting

Access to the Indian Valley Campus is provided by Ignacio Boulevard, a four lane road that transitions to a two land road on the campus. The roadway extends in an easterly direction from the campus and connects with Highway 101. There is an all-way stop where Sunset Parkway intersects Ignacio Boulevard from the north, approximately a quarter mile east of the campus. In 2007, the intersection operated at an unacceptable level during the AM peak hour, due to traffic generated by the San Jose Middle School, which is located on the northwestern of the intersection (COM 2007). As the intersection of Sunset

Parkway and Ignacio Boulevard remains unsignalized and a limited amount of growth has occurred on campus and in the surrounding area, the intersection continues to operate an unacceptable level during the AM peak hour. Pathways exist all throughout the campus. Although pathways in the central campus are in good condition, many further away are in need of repair.

Discussion of Potential Project Impacts

a-b) ***No Impact***. The proposed project would serve the existing student population on the Indian Valley Campus and thus would not induce population growth in the City of Novato or elsewhere in Marin County. As a result, construction and operation of the proposed improvement project would not generate new trips that would add traffic to the intersection of Ignacio Boulevard and Sunset Parkway, which is currently operating unacceptably during the AM peak hour. There would be no impact with regard to these criteria.

c) ***No Impact***. The proposed project does not include uses that would affect air traffic or result in changes to air patterns. There would be no impact with regard to this criterion.

d-f) ***No Impact***. The proposed project does not include the construction of roads or infrastructure, and therefore would not adversely impact nearby roadways. Emergency access to nearby residences as well as public transit, bicycle, and pedestrian facilities would not be impeded by implementation of the proposed project. There would be no impact with regard to these criteria.

Discussion of Potential Cumulative Impacts

The improvement projects listed in the 2016-2021 FMP, including the improvements to be constructed under the proposed project, would not induce population growth in the City of Novato or elsewhere in Marin County. As a result, construction and operation of the proposed project would not generate new trips that would add traffic to nearby roadways. As a result, no cumulative impact related to traffic generated by campus development would occur.

There are no planned or recently approved off-site developments within the immediate vicinity of the campus. The closest planned or recently approved project in the City of Novato is the Oakmont Senior Living project, located over one mile to the north of the campus at 1461 South Novato Boulevard. As a result, the proposed project would not combine with other planned or recently approved projects in the City to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or conflict with an applicable congestion management program. In addition, the proposed improvements would not combine with other planned or recently approved projects in the City to adversely affect air traffic patterns, increase traffic hazards, result in inadequate emergency access, and conflict with adopted policies, plans, or programs promoting alternative transportation. There would be no cumulative impact with regard to transportation and traffic.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
17. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is::				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	■	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	■	☐

Relevant Elements of the Project and its Setting

The Indian Valley Campus is known to contain a Native American burial site and the campus is in constant and close connection with affiliated tribes so as to minimize any potential impacts on tribal cultural resources (TRC).

Discussion of Potential Project Impacts

a-b) ***Less than Significant Impact.*** Assembly Bill (AB) 52, which came into effect on July 1, 2015, requires that lead agencies consider the effects of projects on tribal cultural resources and conduct notification and consultation with federally and non-federally recognized Native American tribes early in the environmental review process. According to AB 52, it is the responsibility of the tribes to formally request of a lead agency that they be notified of projects in the lead agency's jurisdiction so that they may request consultation. As of the publication of this Initial Study, no tribes have formally requested to be notified of projects on the campus. However, as discussed above, the campus does consult with local tribes in the area on a consistent basis. As discussed in the response to **Item 5(b)** above, the improvements to be constructed under the proposed project would require minimal ground disturbance or excavation, and in the case of the organic farm improvements, to the extent there would be excavation, it would mainly occur in areas where the ground was previously disturbed although some previously undisturbed

ground would be graded to install the shade structure, greenhouses, and trail. Therefore the potential to affect archaeological resources, including TRCs, is low. However, as the Indian Valley Campus is considered a culturally sensitive area, the proposed project would be subject to Policy AP 6580 of the Marin Community College District Administrative Procedures, which includes procedures and practices that the campus requires all construction contractors to implement in order to protect archaeological resources, including human remains, from inadvertent damage. As a result, the College has determined that there would be a less than significant impact with respect to TRCs.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP could adversely affect TRCs on campus. Each project would adhere to Policy AP 6580 and would undergo additional environmental review when they are scheduled to be constructed, and if required, mitigation would be provided to reduce impacts related to TRCs. Furthermore, as discussed above, with adherence to Policy AP 6580, the proposed project would have less than significant project-level impacts with respect to TRCs. Therefore, the contribution of the proposed project to the cumulative impact associated with TRCs on campus would not be cumulatively considerable.

Anticipated future development has the potential to adversely affect TRCs that might be present in the areas affected by development within the City. However, AB 52 requires that the City work with native American tribes to avoid or minimize impacts to TRCs As discussed above, no tribes have formally requested to be notified of projects on the campus. However, with adherence to Board Policy AP 6580, the proposed project would have less than significant project-level impacts on TRCs. Therefore, the contribution of the proposed project this cumulative impact would not be cumulatively considerable.

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

Environmental Setting

Water service to Novato, including to the Indian Valley Campus, is provided by the North Marin Water District (NMWD). Approximately 80 percent of NMWD water is purchased from the Sonoma County Water Agency, which is sourced from the Russian River. The remaining 20 percent comes from the Stafford Lake in Novato. Beneath the perimeter road and Ignacio Boulevard run two main water lines that deliver water to the campus (NMWD 2016a).

Wastewater service to the Indian Valley Campus is provided by the Novato Sanitary District (NSD), which maintains the 6-inch main collection line on the campus. The NSD operates the Novato Wastewater Treatment Plant (WWTP), which provides primary and secondary treatment, as well as ammonia removal and filtration. Currently, the Novato WWTP has a design capacity of 7.0 million

gallons per day (mgd) average dry weather flow, and treats 3.4 million mgd. The treatment plant is expected to reach capacity by 2025 (Hoover 2017).

Solid waste from the Indian Valley Campus and most of Marin County in general, is disposed of at the Redwood Landfill, a permitted Class III disposal site situated north of Novato. The landfill has a total capacity of 26,770,000 cubic yards and as of February 2016, there is approximately 17,834,000 cubic yards of capacity remaining. Redwood Landfill is projected to close in 2036 (McCutcheon 2017).

Discussion of Potential Project Impacts

a, e) ***Less than Significant Impact***. There would be no new wastewater generation associated with the amphitheater. The organic farm classroom complex would generate wastewater, which would be treated at the Novato WWTP. The San Francisco Bay Regional Water Quality Control Board (RWQCB) regulates water quality and quantity of effluent discharged from the Novato WWTP. The existing design capacity of the Novato WWTP is approximately 7 mgd average dry weather flow. As the Novato WWTP is currently treating 3.4 mgd, the plant has approximately 3.6 mgd of excess treatment capacity. As discussed in response to **Item 18(b)** below, the volume of wastewater generated by the organic farm classroom complex could be accommodated by the excess treatment capacity at the Novato WWTP. Consequently, wastewater discharged from the organic farm classroom complex is not expected to contribute to an exceedance of applicable wastewater treatment requirements. The impact would be less than significant.

b) ***Less than Significant Impact***. Only the organic farm classroom complex would demand potable water, which would be provided by supplies from the NMWD. Approximately 80 percent of the NMWD water supply water comes from the Russian River while about 20 percent of the NMWD water supply comes from Stafford Lake. Water from the Russian River does not require treatment while water from Lake Novato is treated at the Stafford Lake Water Treatment Plant (WTP), which has a treatment capacity of 6.0 mgd (City of Novato 2013). The organic farm classroom complex would demand approximately 4,531 gallons per day (gpd) of water, which is a fraction of the treatment capacity of the Stafford Lake WTP. Therefore, there is enough capacity at the Stafford Lake WTP to serve the organic farm classroom complex, and this impact would be less than significant.

As discussed in response to **Item 18(a)**, above, the organic farm classroom complex would be served by the Novato WWTP. The WWTP's treatment capacity is approximately 7.0 mgd which, based on current sewage flows, leaves approximately 3.6 mgd of excess treatment capacity. The organic farm classroom complex would generate about 4,078 gpd of wastewater.[6] Therefore, there is enough excess capacity at the WWTP to serve the organic farm classroom complex, and no expansion of the WWTP would be required. The impact would be less than significant.

c) ***Less than Significant Impact***. The proposed outdoor amphitheater would result in approximately 4,100 square foot increase in impervious surfaces on the campus while the proposed organic farm improvements and Ohlone Cluster demotion would result in a decrease in impervious surfaces on the campus. The increase in runoff on campus related to the amphitheater would be small and would not substantially exceed the capacity of existing or planned stormwater drainage systems. Therefore, development of the proposed project would not require or result in the construction of new storm water

6 Based on 90 percent of campus water demand 4,531 gpd X 90 percent = 4078 gpd).

drainage facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, this impact is considered less than significant.

d) ***Less than Significant Impact***. The organic farm classroom complex would demand approximately 4,531 gpd of potable water.[7] Detailed information on the City's water supply and water demands is documented in the NMWD's 2015 Urban Water Management Plan (UWMP). Water demand projections in the 2015 UWMP are based upon growth assumptions in the City's general plan and water use factors for various land uses. The 2015 UWMP documents that there is sufficient water supply for all existing and planned growth from existing and planned future sources (NMWD 2016b). As the improvements to be constructed under the proposed project are consistent with the general plan designation for the campus, it is reasonable to assume that the project is included in the growth assumptions used in the NMWD's 2015 UWMP. Based on the 2015 UWMP, sufficient water supplies are available to serve the project from existing entitlements and resources, and this impact is considered less than significant.

f, g) ***Less than Significant Impact***. The proposed organic farm classroom complex would generate 158 pounds of solid waste per day.[8] None of the other improvement projects would generate a substantial amount of solid waste. Redwood Landfill has a total capacity of 26,770,000 cubic yards. The landfill has a remaining capacity of 17,834,000 cubic yards, or approximately 67 percent of its permitted capacity (McCutcheon 2017). Under current projected development conditions, the landfill has a projected lifespan extending through 2036. Given the available capacity at the landfill, the additional solid waste generated by the organic farm classroom complex is not anticipated to cause the facility to exceed its daily permitted capacity. Therefore, solid waste impacts would be less than significant.

Discussion of Potential Cumulative Impacts

The remaining improvement projects listed in the 2016-2021 FMP could adversely affect utilities and service systems on campus. Each project would undergo additional environmental review when they are scheduled to be constructed, and if required, mitigation would be provided to reduce impacts to utilities and service systems. As discussed above, the proposed project would have less than significant project-level impacts with respect to utilities and service systems. Therefore, the contribution of the proposed project to the cumulative impact related to utilities and service systems on campus would not be cumulatively considerable.

Anticipated future development in Novato would result in the demand for additional potable and non-potable water, water and wastewater treatment capacity, and solid waste disposal capacity. However, as indicated above, the increase in water demand, and the wastewater and solid waste generated by the proposed project would be small and would be accommodated by existing water supplies, available WTP and WWTP treatment capacity, and available landfill capacity. As a result, the project's contribution to these impacts would not be cumulative considerable.

---

7 Based on a water demand factor of 23 gpd/students (197 students X 23 gpd/students = 4,531 gpd).

8 Based on a solid waste generation rate of 0.8 pounds/day/student (197 students X 0.8 pounds/day/student = 158 pounds/day.

Issues	Potentially Significant Impact	Less than Significant with Project Mitigation	Less Than Significant Impact	No Impact
19. MANDATORY FINDINGS OF SIGNIFICANCE – The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the *State CEQA Guidelines*):				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?	☐	☐	■	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	■	☐

Discussion of Potential Project Impacts

a) ***Less than Significant Impact with Mitigation***. Please refer to responses under Biological Resources **Items 4(a) through 4(f)**, and Cultural Resources **Items 5(a) through 5(e),** above. Development of the improvement projects on the Indian Valley Campus would not significantly affect fish or wildlife habitat, nor would it eliminate examples of California history or prehistory. With the implementation of **Mitigation Measures BIO-1** and **BIO-2**, identified above in this Initial Study, and adherence to Policy AP 6580 of the Marin Community College District Administrative Procedures, all impacts would be reduced to a less than significant level and the proposed project would not degrade the quality of the environment. Impacts under this criterion would be less than significant.

b) ***Less than Significant Impact***. Cumulative impacts for each environmental factor are addressed in the checklist above. As that discussion shows, the proposed project would not result in significant cumulative impacts. Furthermore, with the mitigation identified in this Initial Study, the contribution of the improvement projects to cumulative impacts would not be cumulatively considerable.

c) ***Less than Significant Impact***. The proposed project would be required to conform to a wide variety of mandatory obligations related to human safety and the quality of their environment, and the specific mitigation measures identified in this Initial Study would reduce all impacts to a less than significant level. Therefore, implementation of the proposed project would not cause substantial adverse effects on human beings, and the impact under this criterion would be less than significant.

VI. SUPPORTING INFORMATION SOURCES

California Department of Conservation (DOC). 2010. Fault Activity Map of California. Available online at: http://maps.conservation.ca.gov/cgs/fam/, accessed June 7, 2017.

DOC. 2014. Farmland Mapping and Monitoring Program (FMMP). Available online at: http://maps.conservation.ca.gov/ciff/ciff.html, accessed June 8, 2017.

California Department of Fish and Wildlife (CDFW). 2015. California Regional Conservation Plans [map]. August. Available online at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed June 7, 2017.

California Department of Forestry and Fire Protection (CalFire). 2007. Fire and Resource Assessment Program (FRAP): Fire Hazard Severity Zones, Marin County. November.

California Department of Toxic Substances Control (DTSC). 2017. EnviroStor Database.

California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

California Department of Water Resources (DWR). 2004. California's Groundwater Bulletin 118: Novato Valley Basin. February. Available online at: http://www.water.ca.gov/groundwater/bulletin118/basindescriptions/2-30.pdf, accessed June 8, 2017.

City of Novato. 1996. *City of Novato General Plan*. March.

City of Novato. 2013. *Existing Conditions Report: Utilities*.

City of Novato. 2016. *Draft Novato General Plan 2035*. August.

College of Marin (COM). 2007. *Measure C, Bond Spending Implementation Plan for College of Marin (2007-2013), Indian Valley Campus Environmental Impact Report* SCH No. 2007032097. October. Prepared by Amy Skewes-Cox, AICP.

College of Marin (COM). 2015. *Strategic Plan 2015-2018*. October 22.

Federal Emergency Management Agency. May 18, 2009. Flood Insurance Rate Map No. 06085C0059H for Santa Clara County, California. (FEMA 2009)

Federal Emergency Management Agency (FEMA). 2009. Flood Insurance Rate Map No. 06041C0279D for Marin County, California. May 4.

Governor's Office of Planning and Research (OPR). 2008. Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review. June 19, 2008. Available online at: http://opr.ca.gov/docs/june08-ceqa.pdf, accessed June 7, 2017.

Hoover, Julie. 2017. Administrative Secretary, Novato Sanitary District. Personal communication with Sylvie Josel, Impact Sciences, June 7.

Intergovernmental Panel on Climate Change (IPCC). 2007. Climate Change 2007: The Physical Science Basis, Summary for Policymakers. Available online at: https://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4-wg1-spm.pdf, accessed June 7, 2017.

McCutcheon, Alisa. 2017. Technical Manager, Redwood Landfill. Personal communication with Sylvie Josel, Impact Sciences, February 14.

Natural Resources Conservation Service (NRCS). 2017. Web Soil Survey. Available online at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx, accessed June 8.

North Marin Water District (NMWD). 2016a. Annual Report FY 2015-2016.

NMWD. 2016b. 2015 Urban Water Management Plan (UMWP). June.

United States Environmental Protection Agency (USEPA). 2014. Causes of Climate Change. Available online at: http://www.epa.gov/climatechange/science/causes.html, accessed June 7, 2017.

VII. INITIAL STUDY PREPARERS

College of Marin

Greg Nelson, Vice President for Finance & College Operations

Impact Sciences, Inc.

Shabnam Barati, Ph.D., Principal

Paul Stephenson, AICP, Senior Project Manager

Sylvie Josel, Staff Analyst

Van Hoang, Publications Coordinator