

**TABLE 3-2
EXECUTIVE SUMMARY**

PROJECT IMPACTS	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
TRAFFIC AND CIRCULATION		
<p>Impact 5.1-a Freeway Levels of Service Impacts</p> <p>Table 5.1-4 identifies cumulative freeway conditions with implementation of the Project. In comparison to the previous military uses of the Hamilton Army Airfield, the Project would add approximately 70 vehicle trips to the Hamilton Army Airfield area roadway network in the AM peak hour. In the PM peak hour, the Project will result in approximately 311 fewer vehicle trips than the previous military uses. The additional AM peak hour vehicle trips would result in additional traffic on area freeway segments. Of the 73 total trips projected in the a.m. peak hour, the greatest impact would be on the segment of U.S. 101 between Ignacio Boulevard and State Route 37, where the Project would add approximately 20 peak hour vehicle trips. Under both baseline and cumulative conditions, AM peak hour freeway impacts are considered significant and unavoidable.</p>	<p>Under cumulative conditions, Project generated traffic would have a significant, unmitigable impact on U.S. 101 and State Route 37. Mitigation of project impacts on U.S. 101 under General Plan build-out (cumulative) conditions would be prohibitively expensive and not reasonably feasible to implement. Further, although the Novato General Plan contains a goal for widening U.S. 101, there are no local, regional, state or federal programs currently in place or proposed, nor any funding that has been identified or allocated to implement such improvements. Improvements to the U.S. 101 corridor would likely represent major freeway widening and/or improvements on the Northwest Pacific Railroad right-of-way. Both of these suggested improvements have met with substantial community opposition and resistance.</p> <p>The magnitude of the improvements necessary along the U.S. 101 corridor are so large that no single project could reasonably bear the burden. There are no Project-related mitigation measures identified that would be reasonably feasible to implement for regional freeway impacts. As such, this impact would remain significant and unavoidable.</p>	<p>Significant and unavoidable.</p>

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<p>Impact 5.1-b Intersection Levels of Service Impacts</p> <p>As noted in the Disposal and Reuse Plan EIS, four intersections were projected to operate below the City's level of service standard under cumulative conditions with or without the project. These intersections are:</p> <ul style="list-style-type: none"> ~ Ignacio Boulevard and Sunset Parkway – LOS F in the AM and PM peak hours ~ Ignacio Boulevard and Entrada Drive – LOS E in the PM peak hour ~ Ignacio Boulevard and Safeway Access – LOS F in the PM peak hour ~ Ignacio/Bel Marin Keys Boulevard and Nave Drive – LOS E in the PM peak hour <p>All other intersections were projected to operate at acceptable service levels.</p> <p>As noted in Section 5.1, the City has recently updated its citywide cumulative traffic model (Citywide Traffic Projections and Traffic Fee Study Update, April 1999). More recent projections for five area intersections indicate that the intersection of Ignacio/Bel Marin Keys Boulevard and Nave Drive would operate at an acceptable LOS D under cumulative conditions. Table 5.1-5 presents level of service calculations derived in the Citywide Traffic Projections and Traffic Impact Fee Study Update.</p> <p>In most cases, the addition of 73 AM peak hour trips spread over local Hamilton Army Airfield area intersections would not result in any noticeable change in traffic conditions. However, at the intersection</p>	<p>The property-owner/developer shall contribute their proportionate fair share through the Citywide Development Impact Fee Program, which will accomplish the signalization of the intersection of Ignacio Boulevard and Sunset Parkway. In the AM peak hour, the Project's incremental contribution would represent approximately 34 percent of the cumulative growth in traffic congestion at this intersection.</p>	<p>Less-than-significant.</p>

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<p>Impact 5.1-b Continued...</p> <p>of Ignacio Boulevard and Sunset Parkway, the additional traffic would contribute to the cumulative impact of this intersection. Although the intersection is projected to operate at LOS F, the reduction in PM peak hour traffic would represent a beneficial impact (especially since the PM peak hour is generally more congested than the AM peak hour).</p>		
AIR QUALITY		
<p>Impact 5.2-a - Traffic-Related Ozone Precursor Emissions:</p> <p>The Disposal and Reuse EIS indicated that the Reuse Plan would result in no significant impacts related to traffic-related ozone precursor emissions. The EIS analysis of such emissions was based on conditions described in the BAAQMD 1994 CAP. The determination of no significant impacts is being revisited in this EIR due to revisions to the CAP, including the addition of two new TCMs.</p> <p>The EIS utilized 1995 vehicle trip and daily VMT conditions as a baseline for analysis, which approximated conditions described in the 1994 CAP, since the 1994 CAP was based on land use and transportation patterns in 1994 and included most military installations as active facilities. As noted in Section 5.0, the conditions on and adjacent to the base at the time that the federal decision became final for the closure of the base (1995) are evaluated as project baseline conditions in this EIR. Therefore, the baseline air quality conditions described in the EIS would also apply to this EIR.</p> <p>A s a r e s u l t , t h e</p>	<p>No additional mitigation measures are required beyond those identified in the previous EIS.</p>	<p>Less-than-significant.</p>

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<p>Impact 5.2-a Continued...</p> <p>conclusions of the traffic-related ozone precursor emissions impact analysis provided in the EIS are hereby incorporated into this EIR. As stated in the EIS, the net increase in traffic-related ozone precursor emissions would be approximately 11 pounds per day for ROG and 20 pounds per day for NOx. These increases would not exceed the current BAAQMD impact significant threshold of 80 pounds per day.</p> <p>These EIS estimates reflect traffic-related ozone precursor emissions for the disposal and reuse of all Navy-owned portions of DODHF Novato. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the Disposal and Reuse EIS as shown on Exhibit 1-1. The portion of the Redevelopment Plan Project Area that includes the NHP Master Plan Area was previously evaluated in the <i>Hamilton Field Project Final Subsequent EIR</i> and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). The portion of the Redevelopment Plan Project Area analyzed in the Disposal and Reuse EIS would result in impacts similar to those described above. The cumulative air quality impacts associated with implementation of the DODHF properties and NHP Master Plan were described in the Disposal and Reuse EIS cumulative impact evaluation. The Project Area analyzed in this EIR (e.g., the Navy-owned DODHF Planning Areas and the NHP Master Plan Area) are included within the areas described in the EIS cumulative air quality evaluation. The EIS concluded that no cumulative air quality impacts would result. Therefore, traffic-related ozone precursor emissions under the proposed CEQA Project would be similar to the already less than significant cumulative emissions evaluated in the EIS. As such, implementation of the proposed CEQA Project would result in no new or additional impacts. No mitigation measures are required.</p>		

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<p>Impact 5.2-b - Consistency with Air Quality Management Regional Plans (1994 BAAQMD Clean Air Plan):</p> <p>As described in the Disposal and Reuse EIS, the proposed CEQA Project would result in no significant impacts related to air quality. However, revisions to the 1994 CAP, as implemented in the 1997 CAP, have resulted in two additional TCMs which apply to the Project. As noted in the BAAQMD thresholds of significance discussion above, a project would have a significant impact on air quality plans if it would result in an individually significant air quality impact, would be located in a jurisdiction with a general plan that is inconsistent with the CAP, or would be inconsistent with the jurisdiction's general plan.</p> <p>The Reuse Plan has been found to be consistent with the Novato General Plan and conforms with the zoning designations on the property (Robert Bein, William Frost & Associates, <i>Hamilton Reuse Plan General Plan Conformance Findings, Planning Commission Staff Report</i>. August 10, 1998). Throughout the General Plan document, specific references are made to the provisions of the Reuse Plan.</p> <p>According to the most recent BAAQMD CEQA Guidelines (April 1996), the Novato General Plan must be found to be consistent with the 1994 CAP. Although consistency with only the 1994 CAP is required by BAAQMD (Henry Hilken, BAAQMD, February 11, 1999), an analysis of Novato General Plan consistency with the new TCMs identified in the more stringent 1997 CAP is included herein to provide a conservative consistency evaluation and to demonstrate the City's good faith effort at trying to meet the new, more stringent CAP requirements. It should be noted that the General Plan was approved in March 1996, prior to the adoption of the 1997 CAP.</p>	<p>No additional mitigation measures are required beyond those identified in the previous EIS.</p>	<p>Less-than-significant.</p>

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<p>Impact 5.2-b Continued...</p> <p>To establish consistency between the Novato General Plan and the 1994 CAP, it must be demonstrated that the General Plan population growth and VMT growth estimates are consistent with the 1994 CAP growth assumptions. This is because the 1994 CAP accounts for incremental growth in the City of Novato, based on the Association of Bay Area Governments (ABAG) projections. The Novato General Plan and 1994 CAP population growth assumptions for the City of Novato both incorporate ABAG Projections '94, and are therefore equivalent. The Novato General Plan growth rate estimate would accordingly not exceed that assumed in the 1997 CAP. As noted above, for the Novato General Plan to be determined to be consistent with the CAP, the rate of increase in VMT for the City must be equal to or lower than the rate of increase in population. The proposed land uses under the Reuse Plan were anticipated in the Novato General Plan. Therefore, the Project would not result in an increase in VMT beyond that anticipated in the General Plan. Since these land uses are anticipated in the General Plan, the Project would not increase the rate of VMT growth in the City above the rate of City population growth.</p> <p>The Novato General Plan would also be consistent with all five TCMs included in the 1994 CAP, and the two additional TCMs in the 1997 CAP, for which the City would be an implementing agency.</p> <p>Since the General Plan includes policies and programs to implement the seven TCMs in the CAP which apply to local jurisdictions, the City has demonstrated reasonable effort to implement the TCMs in the CAP. As a result, the General Plan is consistent with regional air quality planning.</p>		

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<p>Impact 5.2-b Continued...</p> <p>The Reuse Plan also contains several TCMs. Circulation Goal 5.6.1.2 states that “Development within the [Reuse Plan] area will promote alternative transportation modes through: provision of continuous bicycle and pedestrian facilities; provision of bicycle and pedestrian amenities at major activity centers including employment centers, civic areas, and parks; design of internal roadways to accommodate bus transit within the site and provision of bus shelters and turnout areas where appropriate; focus of higher density land uses adjacent to public transit; application of transit-oriented design (TOD) and pedestrian-oriented design (POD) principles; and implementation of parking control measures limiting the amount of parking which can be provided in key areas of the site.” In addition, Reuse Plan Circulation Goal 5.6.1.4 states that “Development of the [Reuse Plan] area will complement the potential use of the [Golden Gate Bridge, Highway and Transit District] GGBHTD right-of-way as a transitway.”</p> <p>Although the portions of the DODHF Novato Navy-owned properties subject to the PA and evaluated in this EIR would result in increased emissions of ROG and NOx (refer to Impact 5.2-a), this incremental increase in regional emissions would not exceed BAAQMD thresholds. Therefore less than significant impacts associated with traffic-related ozone precursor emissions would result. As noted above, the proposed CEQA Project has been found to be consistent with the Novato General Plan.</p>		

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NOISE		
<p>Impact 5.3-a - Traffic-Related Noise Impacts</p> <p>The DODHF Novato Disposal and Reuse EIS identified that the proposed Project would result in residential reuse in areas that would be exposed to existing ambient noise levels significantly above the land use compatibility guidelines provided in the Novato General Plan. This conclusion would not change with the proposed CEQA Project. The general plan sets the acceptable noise level for residential housing at 60 dB. This level currently is exceeded due to noise from traffic along area roadways. The 60 dB noise level is exceeded in Capehart/Hillside Housing to a distance of 1,500 feet from the centerline of U.S. Highway 101, an area encompassing the western two-thirds and the most densely built portion of the planning area. This noise level is also exceeded in Rafael Village north and south of Ignacio Boulevard to a distance exceeding 750 feet from the road, an area encompassing most of Rafael Village. The remaining planning areas would not be exposed to noise levels exceeding the standards for their specific type of land use.</p>	<ul style="list-style-type: none"> ' The City of Novato and Caltrans should evaluate the feasibility of additional sound walls along U.S. Highway 101 in order to reduce traffic noise impacts on adjacent properties. During detailed planning for new housing units in Rafael Village, the City of Novato should consider site designs that provide for sound walls along Ignacio Boulevard. Although sound walls would reduce ambient noise levels by approximately 5 dB, the noise levels would still be significant in those areas nearest U.S. Highway 101 and Ignacio Boulevard. <p>In response to this mitigation measure, the following additional mitigation measure has been developed.</p> <ul style="list-style-type: none"> ' Prior to issuance of a demolition permit at Rafael Village, the City of Novato will evaluate several options that could reduce noise levels for local sensitive receptors including reducing speed limits on Ignacio Boulevard (traffic speed reductions of 6 mph can reduce average traffic noise levels by 3 dBA, for speeds below 50 mph), restricting truck traffic during peak traffic periods to minimize noise generation, integrating a combination berm/soundwall into the site design characteristics of Rafael Village, and designing new residences so the outdoor activity area (generally considered the backyard area) is blocked by the residential structure from existing noise sources. 	<p>Significant and unavoidable.</p>

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<p>Impact 5.3-a Continued...</p>	<p>The City shall require one or more of these options, or other environmentally equivalent noise-mitigating measures, to be implemented with Project construction to reduce traffic noise levels by 3 dBA for existing and future residents along Ignacio Boulevard. Refer to Section 1.4 for a definition of environmental equivalence.</p>	
<p>HAZARDOUS MATERIALS AND WASTE</p>		
<p>Impact 5.4-a - Asbestos Contamination</p> <p>A number of buildings and residential structures on the site that contain ACM would be demolished or renovated with the proposed CEQA Project. Demolition or renovation of buildings with ACM has the potential to release asbestos fibers into the air. Asbestos fibers could be released due to disturbance or damage of various building materials, such as pipe and boiler insulation, acoustical ceilings, sprayed-on fireproofing, and other materials used for soundproofing or insulation. Only friable (crumbly) ACM is considered a health risk. Nonfriable ACM, such as piping, shingles, or floor tile, is not a health risk unless it is mechanically abraded in such a way as to produce dust.</p> <p>Such activities would be subject to all applicable federal, state, and local regulations. Department of Defense policy is that “property with ACM will not be disposed through the BRAC process unless it is determined that the ACM does not pose a threat to human health at the time of transfer.” Demolition activities would occur following transfer. The City, as dictated by the terms of the Purchase Agreement, would be responsible for asbestos abatement for the Navy owned properties following its disposal. All ACM encountered prior</p>	<p>No additional mitigation measures are required beyond those identified in the previous EIS.</p>	<p>Less-than-significant.</p>

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PROJECT IMPACTS	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Impact 5.4-a Continued...</p> <p>to or during demolition or renovation of on-site structures will be disposed of at the Redwood Landfill, located four miles north of the City of Novato. The Redwood Landfill is permitted as a Class II and III facility, and is capable of accepting construction/demolition materials and asbestos. The landfill operator will be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of ACM. The disposal of demolition debris shall comply with any such requirements. Because any building demolition or renovation must comply with state and federal occupational health, safety and air emission regulations for asbestos abatement, no significant environmental impact would result from these activities.</p> <p>In addition, the abatement of damaged, friable asbestos-containing materials found in the site's industrial buildings was completed in July 1996. For residential buildings at DODHF Novato, the 1995 investigation conducted by the Public Works Center Norfolk Virginia recommended no immediate abatement actions for any identified asbestos-containing material in the residential buildings. Based on these prior investigations and abatement activities, the Supplemental EBS concluded that asbestos abatement at DODHF Novato has been completed and, as such, no asbestos hazards remain on the site (U.S. Navy, April 1997). Therefore, no significant asbestos hazards would be anticipated with implementation of the proposed CEQA Project.</p>		

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<p>Impact 5.4-b - Lead-Based Paint Contamination</p> <p>Lead-based paints (LBPs) have been used at DODHF Novato since its development. It is likely that all of the buildings at the facility built before 1980 have some amount of lead-based paint. In accordance with Department of Defense policy and the Residential Lead-Based Paint Hazard Reduction Act of 1992, housing constructed prior to 1978 is required to be inspected for LBP hazards. LBP hazards in housing constructed prior to 1960 is required to be abated if the housing is to be transferred out of federal ownership. The results of LBP surveys and lead warning statements are required to be included in any contract for transfer or lease.</p> <p>The Basewide EBS indicated that no lead dust hazards were identified in the DODHF housing areas. However, three parcels, identified as parcels 65B, 73 and 76, are classified as ECP Area Type 7 because lead was detected in the soil above the HUD guidelines of 400mg/kg. Lead levels in the soil in excess of the HUD standards could be considered a public health hazard if human exposure occurs. The Navy is responsible for abating lead levels at these three parcels. No immediate abatement actions were identified in the September 1995 survey of the Capehart/Hillside Housing area by the Public Works Center San Francisco Bay, but it did recommend implementation of an operations and maintenance plan for the area until the identified LBPs are abated. Response measures for lead hazards in soil at these three parcels will be determined based on an assessment of the potential risk to human health and the environment and, consistent with the terms of the Offer to Purchase, will be the responsibility of the Navy. The Navy will continue to be responsible for lead abatement following transfer, consistent with the requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).</p>	<p>No additional mitigation measures are required beyond those identified in the previous EIS.</p>	<p>Less-than-significant.</p>

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<p>Impact 5.4-b Continued...</p> <p>A FOST, which documents environmentally related findings regarding the lack of a threat to human health and the environment based on the condition of the property, has been completed for these parcels that identifies necessary lead abatement measures to be completed prior to transfer. Because lead-based paint will be abated on the Project site by the Navy prior to transfer, significant human health hazardous associated with lead exposure would not be anticipated with Project implementation.</p> <p>All LBP encountered prior to or during demolition or renovation of on-site structures will be disposed of at the Redwood Landfill, located four miles north of the City of Novato. The Redwood Landfill is permitted as a Class II and III facility, and is capable of accepting construction/demolition materials. The landfill operator will be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of LBP. The disposal of demolition debris shall comply with any such requirements.</p> <p>Because lead-based paint will be abated on the Project site by the Navy prior to transfer, significant human health hazards associated with lead exposure would not be anticipated with Project implementation.</p>		

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PROJECT IMPACTS	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
ALTERNATIVES		

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<p><u>Demolition of Structures in the Capehart/Hillside Housing Planning Area</u></p> <p>1. This alternative would result in substantially higher levels of construction traffic than would otherwise be anticipated with the proposed CEQA Project. The demolition waste generated by implementation of this alternative could more than double the demolition waste generated by implementation of the proposed CEQA Project (assuming all Capehart/Hillside units are demolished). As a result, more than twice as many demolition-related truck trips would be anticipated over the course of development of this Planning Area. Construction vehicle trips would also be expected to increase with this alternative. More construction materials would be required to construct new homes than would be necessary to restore existing residential structures. Construction-related truck trips are generally considered potentially significant if they would interfere with area traffic flows. For the purposes of this analysis, it is conservatively assumed, given the maximum number of structures that could be demolished (708), that a temporary, but potentially significant traffic impact due to demolition and construction related activities could result, and mitigation measures would be required. As the land use designations under this alternative are the same as those identified for the Project, the long-term traffic impacts of this alternative would be the same as with the proposed CEQA Project.</p>	<p>Prior to issuance of a demolition permit, the property owner/developer (or the property owner/developer's construction manager) shall submit a Construction Staging Logistics Plan for review and approval by the City of Novato. At a minimum, the Construction Staging Logistics Plan shall include measures to ensure the safety of and minimal disruption to local traffic flow. If the property owner/developer cannot ensure minimal disruption of traffic, the following measures shall be considered:</p> <ul style="list-style-type: none"> ~ prior to issuance of a demolition permit, require the property owner/developer to identify construction and phasing plans, including identification of staging areas for each major construction phase; ~ require most construction-related employees to arrive before 7:00 a.m. and depart before 4:00 p.m.; ~ prior to issuance of a demolition permit, require the property owner/developer to designate travel routes for trucks to the site. The truck travel routes shall be subject to review and approval by the City of Novato. 	

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<p>2. No significant cultural resources were identified in the Capehart/Hillside Housing area during preparation of the Disposal and Reuse EIS. However, because this alternative would require more extensive excavation to accommodate new building foundations than would be anticipated with the proposed CEQA Project, the potential disturbance of subsurface cultural resources would be more likely to occur. In addition, the Reuse Plan identifies as a site constraint an archaeological site located to the west of the Capehart/Hillside Housing which may extend into the Planning Area.</p>	<p>Prior to issuance of a demolition permit, the property owner/developer (or the property owner/developer's construction manager) shall protect cultural resources within the Reuse Plan Area in accordance with the City's Cultural Resources Protection Ordinance, as stated in Reuse Plan Policy 7.4.1.1.9.</p>	

