

SECTION 1 INTRODUCTION

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

This is the environmental impact report (“EIR”) for the Redevelopment Plan (the “Redevelopment Plan”) for the Hamilton Field Redevelopment Project, adopted by the City Council of the City of Novato on July 14, 1998, by Ordinance No. 1394, as amended on November 24, 1998, by Ordinance No. 1401, and includes all activities in furtherance of and pursuant to the Redevelopment Plan. The Redevelopment Agency of the City of Novato (“Agency”) is the lead agency for this EIR. The Redevelopment Project Area is shown on Exhibit 1-1.

The Redevelopment Plan was adopted pursuant to the provisions of Chapter 4.5, Article 1, commencing with Section 33492 of the Community Redevelopment Law (Health and Safety Code Section 33000 *et seq.*) (the “General Base Closure Legislation”). Pursuant to Section 33492.18, the preparation of this EIR was delayed and is required to be prepared and certified within 18 months after the effective date of the ordinance adopting the Redevelopment Plan (the effective date of Ordinance No. 1394 was August 13, 1998, and the effective date of Ordinance No. 1401 was December 24, 1998).

The objective of the Redevelopment Plan is to implement a Reuse Plan for Hamilton Army Airfield with respect to the reuse and redevelopment of that certain Navy-owned property at Hamilton Field known generally as the Department of Defense Housing Facility (“DODHF Property”). The DODHF Property was declared excess property under the provisions of the federal Defense Base Closure and Realignment Act of 1993, as supplemented by the 1994 “Pryor Amendment” and the 1994 Base Closure Community Assistance Act. The Reuse Plan, dated October 1995, and amended November 1996, was prepared in accordance with the foregoing federal legislation and implementing State law and was adopted by the Novato City Council and incorporated into the City’s general plan as a preferred alternative to otherwise applicable general plan provisions, setting forth both types and locations of land uses at Hamilton Field and the goals and policies for the reuse and redevelopment of the various areas of Hamilton Field as they are disposed of by the federal government.

The Novato Public Finance Authority (“Authority”) has entered into an agreement with the Department of the Navy (“Navy”) to purchase the DODHF Property (exclusive of certain parcels of the DODHF Property to be conveyed separately to the City or other public agencies under a Public Benefit Discount Conveyance). In order to complete the acquisition of the DODHF Property from the Navy, to carry out the Redevelopment Plan and implement the Reuse Plan, the following actions are contemplated:

Exhibit 1-1
Redevelopment Project Area

- (1) The City, Authority and Agency will select a Master Developer for the DODHF Property;
- (2) The Authority will enter into a Purchase and Sale Agreement (“PA”) with the Master Developer for the DODHF Property (exclusive of parcels acquired separately from the Navy by the City);
- (3) The City will enter into a Development Agreement (“DA”) with the Master Developer for the reuse and redevelopment of the DODHF Property in accordance with the Reuse Plan, which shall be deemed the Master Plan for the property;
- (4) The Agency will enter into an Owner Participation Agreement (“OPA”) with the Master Developer for Agency assistance to the Master Developer conditioned upon reuse and redevelopment of the DODHF Property in accordance with the Redevelopment Plan and the Reuse Plan;
- (5) The Master Developer will (a) take title to the DODHF Property to be conveyed to the Master Developer, (b) proceed to prepare, process and seek approval of precise development plans, master tentative maps and other entitlements for the property, (c) will maintain certain improvements on the property consisting of the Capehart and Hillside areas housing units until rehabilitation or construction occurs in those areas, and (d) will undertake to commence the reuse and redevelopment of the property pursuant to the DA and OPA when all entitlements for such reuse and redevelopment have been obtained.

For purposes of this EIR, the “Project” is implementation of the Redevelopment Plan and the Reuse Plan, consisting primarily of the disposal, reuse and redevelopment of the DODHF Property pursuant to the Redevelopment Plan, the Reuse Plan, the PA, DA and OPA and other implementing activities of the City, Authority, Agency and the Master Developer and its successors and assigns. The “Project Area” is the Redevelopment Project Area, including the DODHF Property at Hamilton Field to be used and redeveloped pursuant to the Redevelopment Plan, and the NHP Master Plan Area. [See “PROJECT DESCRIPTION”, Section 4 of this EIR.]

The Guidelines under the California Environmental Quality Act (“CEQA Guidelines”) provide that all public and private activities undertaken pursuant to or in furtherance of a redevelopment plan constitute a single project, and that an EIR on the redevelopment plan shall be treated as a program EIR with no further EIRs required for individual components of the redevelopment plan unless a subsequent EIR or a supplemental to an EIR would be required. (CEQA Guidelines, Section 15180.)

An Environmental Impact Statement (EIS) on the disposal and reuse of the Hamilton Air Force Base (DODHF) was prepared and filed pursuant to the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. Sec. 4321 *et seq.*). The Disposal Record of Decision was filed in June 1998. Pursuant to the CEQA statute, §21083.8 (b)(2), this Draft EIR consists of all of the previously prepared EIS and the additional information that is necessary to prepare a Draft EIR in compliance with this division.

Draft Environmental Impact Report

This EIR has been prepared by the Redevelopment Agency of the City of Novato (“Agency”) as the Lead Agency. The purpose of this EIR is to assess, pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code § 21000 *et seq.*) as amended and the State CEQA Guidelines (State of California Administrative Code Title 14, Chapter 3), the environmental impacts of the proposed Redevelopment Project. CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority.

The EIR is a public document that describes the overall environmental effects of the Hamilton Field Redevelopment Project at a program level of detail and indicates ways to reduce or avoid possible environmental impacts. The EIR also discloses significant environmental impacts that cannot be avoided; growth-inducing impacts; effects found not to be significant; and significant cumulative impacts of past, present, and reasonably foreseeable future projects.

The EIR is an informational document used in the planning and decision-making process. This EIR is further intended to serve as the primary environmental document for subsequent actions, including all local discretionary approvals requested to implement the Project. In addition, this EIR is the primary reference document in the formulation and implementation of a mitigation reporting or monitoring program for the Project. Future development that is not within the purview of this document will require subsequent environmental review in compliance with the State CEQA Guidelines.

It is not the purpose of an EIR to recommend either approval or denial of a project. Rather, CEQA requires the decision-makers to utilize information contained within an EIR to assist them in balancing the benefits of a proposed CEQA Project against its unavoidable environmental risks (State CEQA Guidelines §15021). The Lead Agency has the principal responsibility for processing the EIR. Other public agencies (i.e. Responsible Agencies) that may use this EIR in the decision making or permit process will consider the information in this EIR along with other information that may be presented during the CEQA process. A more detailed discussion and identification of the Responsible Agencies is provided in Section 1.4 of this document. In accordance with § 21081(b) of CEQA, if environmental impacts are identified as significant and unavoidable, the Agency may still approve the project if it adopts findings that specific overriding economic, legal, social, technological, or other benefits outweigh the unavoidable impacts. The Agency would then be required to state, in writing, the specific reasons for approving the project based on information in the EIR and other information in the record. This reasoning is contained in a “statement of overriding considerations”, pursuant to § 15093 of the State CEQA Guidelines, (Title 14 Cal. Code of Regulations § 15000 *et seq.*).

1.2 SCOPE OF THE EIR

The Redevelopment Agency of the City of Novato prepared a Notice of Preparation (NOP) and Initial Study for the proposed CEQA Project. The NOP was distributed for public review on November 9, 1998. As such, and pursuant to the California Environmental Quality Act statute, Section 21083.8 (b)(1), the Redevelopment Agency of the City of Novato included a description of the Reuse Plan and a copy of the Executive Summary of the EIS with the NOP indicating the Agency's desire to utilize the EIS as a draft EIR. The Agency requested comments on whether, and to what extent, the EIS provides adequate information to serve as a draft environmental impact report, and what specific additional information, if any, is necessary to comply with CEQA.

The EIS prepared and filed pursuant to NEPA on the closure and reuse of Hamilton Army Airfield substantially meets the requirements of CEQA. However, in consultation with responsible agencies and in light of selected conditions which may have changed since issuance of the Final Record of Decision on the Final EIS in June 1998, the Redevelopment Agency of the City of Novato has determined that the proposed CEQA Project may have a significant effect on the environment, and an Environmental Impact Report (EIR) will be required. In accordance with Section 15060(c) of the CEQA Guidelines, and Section 21083.8 of the State CEQA statute, the Redevelopment Agency of the City of Novato proceeded with preparation of an EIR, augmenting the previously prepared analysis in the issue areas of cumulative traffic, air quality, noise and hazardous materials to ensure full compliance with CEQA. All other elements of the Final EIS, including mitigation measures, adequately analyze the impacts of the proposed CEQA Project and are incorporated by reference into this Draft EIR.

As noted in Section 1.1 of this EIR, the Redevelopment Plan Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS (refer to Exhibit 1-1). Although the NHP Master Plan Area is included in the Redevelopment Plan Area boundaries, the Redevelopment Plan does not govern development within the NHP Master Plan Area. Impacts from development of the NHP Master Plan Area in accordance with the NHP Master Plan were previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and addenda thereto. The proposed CEQA Project would not result in any new activities, actions or projects in the NHP Master Plan Area. As such, the Agency has determined that all environmental effects have been adequately analyzed in previous CEQA documents prepared for the NHP Master Plan and no further environmental analysis for the NHP Master Plan Area is required (refer to Section 4.5 of this EIR for further details and an in depth description of the NHP Master Plan CEQA documents). Redevelopment and reuse of the DODHF property was analyzed in the DODHF Novato Disposal and Reuse EIS. The Disposal and Reuse EIS is incorporated by reference into this EIR (Refer to Section 2.5 of this EIR). Pursuant to CEQA, Public Resources Code §21083(b)(2), this Draft EIR consists of all of the information included in the previously prepared EIS together with the

additional information included in this Draft EIR document. A summary of the Disposal and Reuse EIS is provided in Section 2.5 of this EIR.

1.3 EFFECTS FOUND NOT TO BE SIGNIFICANT

Through the Initial Study and public scoping process, the Agency determined that there was no substantial evidence that the Project would cause or otherwise result in significant environmental effects in the resource areas discussed below. As indicated in the State CEQA Guidelines, no further environmental review of these issues is necessary for the reasons summarized in the following discussion. The substantiation for determining that these issues would result in no impact or a less-than-significant impact is described in further detail in Appendix A, NOP and Initial Study, pursuant to §15128 of the State CEQA Guidelines.

As contemplated at the time the NOP was issued, the City Council amended the Redevelopment Plan on November 24, 1998, to add certain additional area (the “NHP Master Plan Area”). The purpose of adding the NHP Master Plan Area to the Redevelopment Plan was to further the reuse and redevelopment of the DODHF Property. As noted in Section 1.2 of this EIR, no new activities or projects are contemplated in the NHP Master Plan Area from those authorized by the NHP Master Plan and covered by the *Hamilton Field Project Final Subsequent Environmental Impact Report* and addenda thereto for the NHP Master Plan (see Section 2.6 and 4.5 of this EIR for further details).

Land Use

‘ *Conflict with general plan designation, any specific plans or zoning:* The DODHF Novato Disposal and Reuse EIS states that the Reuse Plan provides a description of future land uses for the DODHF Property and outlines a project specific planning process that will occur as part of the Reuse Plan implementation. The Reuse Plan has been found to be consistent with the Novato General Plan and conforms to the zoning designations on the property. Throughout the General Plan document, specific references are made to the provisions and plans of the Reuse Plan. The General Plan identifies a mix of land uses associated with the Reuse Plan which includes 1,208 housing units, a permanent 80 bed homeless facility with support services, 24 acres for parkland, 8 acres for commercial and retail and 43 acres for community facilities. Specifically, the General Plan designates portions of the site as Open Space, Low Density Residential, Community Facilities, Parkland, Medium Density Multiple Family Residential, General Commercial, Neighborhood Commercial, Medium Density Residential, as defined by the Hamilton Reuse Land Use Map. It should be noted that some of the Reuse Planning areas allow special Community Facilities uses not specifically called out in the General Plan land use designations.

The DODHF Property east of Highway 101 (“Mainside”) is zoned Planned Community (P-C), and the Rafael Village is zoned Planned Residential District (RP). As described in the DODHF Novato Disposal and Reuse Environmental Impact Statement (EIS), no significant impacts are expected from the proposed land use designations on the subject properties. The Redevelopment Plan would incorporate the major and other land uses as provided within the Reuse Plan. Although the maximum number of dwelling units permitted under the Redevelopment Plan (1,208 units) is consistent with the

maximum number of dwelling units permitted under the Reuse Plan (1,208 units), it is conceivable that fewer units may ultimately be developed than permitted under the Reuse Plan/Redevelopment Plan due to environmental constraints (e.g., floodplain, parking, creek habitat setbacks, etc.), City code requirements and other factors. In order to implement development within each of the Planning Areas, approval of subsequent planning documentation (i.e., precise development plans) will be required. It is envisioned that development plans for the Capehart/Hillside Planning Area could be processed using a tentative map/precise development plan process and the Rafael Village Planning Area could utilize a “master” tentative map which would define development areas and parcels and the total number of units proposed within each area. It is at this stage that the City would determine whether any subsequent environmental review is required (using this Hamilton Field Redevelopment Project EIR as the basis for subsequent review) and to what extent a reduction in the total number of units within the Planning Area may be necessary or warranted. A reduction in total units would be within the housing limit mandated by the General Plan for the Project Area.

It should be noted that the Redevelopment Plan does not present a precise plan or select from among possible specific projects within the Project Area, but rather establishes a basic framework within which specific plans will be presented, specific projects will be established and specific solutions will be proposed. However, the Reuse Plan will be deemed a Master Plan for the DODHF Property. Moreover, the specific plans, projects and solutions proposed within this framework will be required to demonstrate consistency with the General Plan designation and zoning for the subject site, or pursue a General Plan Amendment and/or rezoning to establish such consistency. Therefore, the Project would not conflict with the General Plan designation or zoning, and no new or additional impacts would result.

Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project: As described in the DODHF Novato Disposal and Reuse EIS, no significant impacts are expected from the proposed land use designations on the subject properties. Neither the Reuse Plan nor the Redevelopment Plan, as the implementing mechanism for the Reuse Plan, would conflict with the General Plan designation or zoning. The Redevelopment Plan would incorporate the major and other land uses as provided within the Reuse Plan, and would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). The specific plans, projects and solutions proposed within the framework of the Redevelopment Plan will be required to demonstrate consistency with all applicable plans or policies adopted by agencies with jurisdiction over the Project. Therefore, the Project would not conflict with applicable plans or policies adopted by agencies with jurisdiction over the Project, and no new or additional impacts would result.

Incompatibility with existing land use in the vicinity: As described in the DODHF Novato Disposal and Reuse EIS, no significant land use compatibility impacts are expected from the proposed land use designations on the subject properties. Demolition activities related to the removal of the existing residences within Rafael Village, and existing structures within Commissary Triangle and Exchange Triangle, and construction activities within all areas of the Project Area would result in minimal impacts due to temporary incompatibility with the existing established uses in the areas surrounding these Planning Areas. The land use impact of demolition and construction activities would not be considered significant due to the short duration of the activities. The Redevelopment Plan incorporates the land uses as provided within the Reuse Plan which has been found to be compatible with other existing land uses in the Project vicinity. Therefore, the Project would not

result in incompatibility with existing land use in the vicinity, and no new or additional impacts would

result.

' *Impacts on agricultural resources or operations (e.g. impacts to soils or farmlands, or impacts from incompatible land uses):* As described in the DODHF Novato Disposal, and Reuse EIS, no agricultural resources or operations are located in the Project Area. Portions of the St. Vincent's and Silviera land holdings located south of and adjacent to Mainside are zoned as open space and are currently used for grazing and hay production; however, implementation of the Reuse Plan would not affect these operations. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, no new or additional impacts on agricultural resources or operations would result from implementation of the Project.

' *Disruptions or divisions of the physical arrangement of an established community (including a low-income or minority community):* As described in the DODHF Novato Disposal and Reuse EIS, the Hamilton Army Airfield was once a self-contained and established community, particularly during the 1940s. However, base closure resulting from the lack of need for the level of defense once required has divided the Novato community for over 25 years. The Reuse Plan can be characterized as promoting adaptive reuse of existing buildings and retention of existing land use patterns. Most existing structures at DODHF Novato are and would remain housing units under the Reuse Plan. Some buildings would be demolished or restored. The Reuse Plan would serve to positively affect low income communities due to an approved Homeless Facilities Agreement approved by the U.S. Department of Housing and Urban Development and the affordable housing goals of the Reuse Plan. The Reuse Plan provides for a cohesive development pattern for a new community. The Reuse Plan also provides for the following housing activities: the rehabilitation or replacement of up to 708 vacated Capehart/Hillside housing units to be rented and sold to very low, low and moderate income households; the rehabilitation of 60 units located within the Capehart/Hillside area to be leased by the City/NPFA to transitional housing providers; and the demolition of the existing Rafael Village housing units and the replacement of the units with a maximum of 500 low and medium density housing units, 15 percent of which must be deed restricted at moderate income levels. The environmental effects associated with the permanent relocation of the temporary homeless shelter located in the Commissary Triangle Planning Area were previously addressed in the *Hamilton Service Center Relocation Environmental Assessment/Finding of No Significant Impact and Mitigated Negative Declaration*, prepared on August 7, 1996 and approved by the Novato City Council in September 1996. The Redevelopment Plan would incorporate the major and other land uses as provided within the Reuse Plan. All residential structures in the Project Area are currently vacant. An established community would not be displaced as a result of implementation of the Reuse Plan, and no replacement housing is required. Therefore, the Project would not disrupt or divide the physical arrangement of an established community, and no new or additional impacts would result.

Population and Housing

- ' *Cumulative exceedances Association of Bay Area Governments (ABAG) regional or local population projections:* Pursuant to §21083.8.1(b)(1), Baseline Provisions, of the State CEQA statute, the baseline for the determination of whether the Reuse Plan may have a significant effect on the environment has been made in the context of the physical conditions which were present at the time that the federal decision became final for the closure of the base. During full occupancy of the base (baseline conditions), the Reuse Plan Area contained 2,448 units, including 995 units in the NHP Master Plan Area, 503 units at Rafael Village, 282 units at Spanish Housing, and 708 units at Capehart/Hillside Housing. The DODHF Novato Disposal and Reuse EIS states that population and housing growth is not considered a significant impact. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would similarly result in no impacts related to population and housing growth because the number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). The specific plans, projects and solutions proposed within the framework of the Redevelopment Plan will be required to demonstrate consistency with all applicable plans or policies adopted by agencies with jurisdiction over the Project, including those plans or policies related to regional or local population projections. Therefore, the project would not cumulatively exceed ABAG regional or local population projections, and no new or additional impacts would result.

- ' *Inducement of substantial growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure):* The DODHF Novato Disposal and Reuse EIS states that population and housing growth is not considered a significant impact. Additionally, the Reuse Plan would reuse existing developed areas with replacement of existing infrastructure and would therefore not induce growth through the extension of utilities or services. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would similarly result in no impacts related to population and housing growth. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). The specific plans, projects and solutions proposed within the framework of the Redevelopment Plan will be required to demonstrate consistency with all applicable plans or policies adopted by agencies with jurisdiction over the Project, including those plans or policies related to regional or local population projections. Therefore, the Project would not cumulatively exceed ABAG regional or local population projections, and no new or additional impacts would result.

- ' *Displacement of existing housing, especially affordable housing:* As described in the DODHF Novato Disposal and Reuse EIS, the Reuse Plan would involve the demolition of the 503 vacant Rafael Village structures and would rebuild the property with up to 500 dwelling units, open space, and parkland. Residential uses within the Capehart/Hillside Housing Planning Area would be

rehabilitated or replaced for affordable housing for low and moderate income persons and families, with sixty of the 708 dwelling units used for transitional housing. The adopted Reuse Plan includes up to 1,208 units. All residential structures in the Project Area are currently vacant and were vacant under baseline conditions. As a result, existing housing would not be displaced as a result of implementation of the Reuse Plan, and no replacement housing is necessary. Therefore, the Project would not displace existing housing, including affordable housing, and no significant impacts would result.

Geologic Problems

- ' *Exposure of people to impacts from fault rupture:* As discussed in the DODHF Novato Disposal and Reuse EIS, the Project Area is located approximately 12 miles east of a trace of the San Andreas Fault, eight miles west of a trace of the Rogers Creek Fault, and seven miles northwest of the Hayward Fault. No faults traverse the Project Area. Therefore, the Project would not result in or expose people to potential impacts involving fault rupture, and no impacts would result.

- ' *Exposure of people to impacts from seismic groundshaking:* The DODHF Novato Disposal and Reuse EIS describes an impact and mitigation measure related to seismic hazards, including ground shaking. Existing and proposed improvements in certain Mainside areas, particularly those on reclaimed land underlain by imported fill or bay mud, but also in areas underlain by alluvium, may be exposed to potentially damaging levels of ground shaking during a large earthquake centered on one of the three nearest active faults. Geology and Soils Mitigation 2 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommended an evaluation of the ability of existing structures to withstand site-specific forces and to identify structures, roads and utilities that should be upgraded to reduce the potential for injury, loss of life, or economic damage. At a minimum, all new construction will be designed to meet applicable building codes. A geotechnical engineer will review design plans and details and other improvement plans to determine whether they are compatible with the geotechnical conditions of the site. This mitigation measure also recommended that the City of Novato consider zoning to limit construction in areas subject to strong ground motion. The specific plans, projects and solutions proposed within the framework of the Redevelopment Plan will be required to comply with all applicable building codes. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to the impacts and mitigation measures described above. Following implementation of the EIS mitigation measure, no new or additional impacts would result.

- ' *Exposure of people to impacts from seismic ground failure, including liquefaction:* The DODHF Novato Disposal and Reuse EIS describes an impact and mitigation measure related to seismic hazards, including liquefaction and lateral spreading. The EIS states that portions of some of the Planning Areas east of U.S. 101, within the historical margin of the San Francisco Bay, may be subject to lateral spreading in response to seismic shaking during a strong earthquake. Additionally, areas underlain by sandy soils, where a shallow water table is present, or during periods of ground saturation due to rainfall or poor drainage, may undergo liquefaction during a strong

earthquake. Implementation of Geology and Soils Mitigation 2, described above, would reduce this potentially significant impact to a less than significant level. The specific plans, projects and solutions proposed within the framework of the Redevelopment Plan will be required to comply with all applicable building codes. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to the impacts and mitigation measures described above.

Following implementation of the EIS mitigation measure, no new or additional impacts would result.

- ' *Exposure of people to impacts from seiche or tsunami hazard:* The DODHF Novato Disposal and Reuse EIS does not directly address Project impacts related to seiche or tsunami hazard. The Hamilton Army Airfield would serve as a buffer between the Project Area and the San Francisco Bay in the event of a seiche related to a substantial seismic event, and the Project Area is located a sufficient distance from the Pacific Ocean to preclude effects related to tsunamis; therefore, the Reuse Plan would result in less than significant impacts. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, no new or additional impacts related to the exposure of people to potential impacts involving seiche, tsunami or volcanic hazard would result from implementation of the Project.

- ' *Exposure of people to impacts from landslides, slope instability or mudflows:* The DODHF Novato Disposal and Reuse EIS describes an impact and mitigation measure related to landslides. The EIS states that new construction in Rafael Village could undermine or weaken unstable slopes. Geology and Soils Mitigation 1 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommended site-specific geotechnical investigations in areas of DODHF Novato covering or creating slopes in excess of 15 percent prior to approval of detailed construction plans to identify potential geologic hazards that may affect new building sites. Additionally, the measure recommended that a geotechnical engineer and engineering geologist inspect the site grading and document placement of engineered fills, stability of cut and fill slopes, and placement of subdrains. The EIS identifies no impacts related to mudflows. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to the impacts and mitigation measures described above. Therefore,

following implementation of the EIS mitigation measure, no new or additional impacts would result.

- ' *Exposure of people to impacts from erosion, changes in topography or unstable soil conditions from excavation, grading or fill:* The DODHF Novato Disposal and Reuse EIS states that the Reuse Plan would result in less than significant impacts related to soil erosion in the Rafael Village during demolition, building removal, and the construction period. The EIS states that this less than significant impact could be reduced by implementing standard erosion control measures during demolition and construction, conducting demolition and construction activities during the dry portion of the year, and reestablishing vegetation as quickly as possible following construction. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to the impacts and mitigation measures described above. Following implementation of these measures, no new or additional impacts related to erosion would result.

- ' *Exposure of people to impacts from subsidence of the land:* The DODHF Novato Disposal and Reuse EIS does not address impacts related to subsidence of the land. However, the EIS describes that on-site soils consist of urban land, xerorthents, and Saurin soils. Limitations for these soils does not include potential for subsidence. Therefore, the Reuse Plan would result in no impacts. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. No new or additional impacts related to potential impacts involving subsidence of the land would result from implementation of the Project.

- ' *Exposure of people to impacts from expansive soils:* The DODHF Novato Disposal and Reuse EIS does not address impacts related to expansive soils. However, the EIS describes that on-site soils consist of urban land, xerorthents, and Saurin soils. Limitations for these soils does not include potential for expansion. Therefore, the Reuse Plan would result in no impacts. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. No new or additional impacts related to potential impacts involving expansive soils would result from implementation of the Project.

- ' *Exposure of people to impacts from unique geologic or physical features:* According to the DODHF Novato Disposal and Reuse EIS, the site contains no unique geologic or physical features. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development

of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. No new or additional impacts related to potential impacts involving unique geologic or physical features would result from implementation of the Project.

Water

- ' *Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff:* The DODHF Novato Disposal and Reuse EIS states that implementation of the Reuse Plan would require improvements to the on-site storm drainage system to accommodate runoff from a storm with a 25-year recurrence period. These upgrades would occur only where new construction is proposed. In conformance with City policy, off-site flow characteristics would not be adversely altered as a result of project improvements. Redevelopment Plan projects proposed pursuant to the Reuse Plan would involve reuse of the existing developed areas in the Project Area and would not increase impervious surfaces or surface runoff quantities in any of the Planning Areas. Therefore, the Project would not result in substantial changes in absorption rates, drainage patterns, or the rate and amount of surface runoff and no new or additional impacts would result.

- ' *Exposure of people or property to water related hazards such as flooding:* The DODHF Novato Disposal and Reuse EIS describes four impacts and associated mitigation measures related to the exposure of people or property to flooding hazards. First, construction in the Rafael Village Planning Area within the mapped 100-year flood area of San Jose Creek would subject those houses to potential flood hazards. Water Resources Mitigation 2 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommended limiting development of new houses to outside the mapped 100-year flood plain of San Jose Creek. A second flooding impact identified in the EIS stated that localized street flooding could occur as a result of deficiencies in the existing storm drain system, which was designed to accommodate a 10-year flood and is inconsistent with the City's 25-year recurrence interval standard. Water Resources Mitigation 3 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommended that the City should require upgrading of all Project Area storm drains to meet current City standards upon redevelopment of Rafael Village. Thirdly, the EIS stated that constrictions in the drainage facilities downstream of Main Gate Road would result in flood hazards in the Exchange Triangle area and adjacent lands along Pacheco Creek during 100-year storm events. Water Resources Mitigation 6 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommended replacing and expanding the deficient drainage facilities downstream from the Exchange Triangle and Main Gate Road as necessary to convey 100-year flows concurrent with the redevelopment of the Exchange Triangle Area. The DODHF Novato Disposal and Reuse EIS also notes that existing development on lower elevation areas of the Mainside would be subject to significant tidal flood hazards, but that this effect is mitigable through the implementation of dikes, pumps and other measures.

The DODHF Novato Disposal and Reuse EIS identifies a fourth impact related to flood hazards which states that development and reuse of the Commissary Triangle and Exchange Triangle could subject persons to flood hazards in the event of a 100-year flood on Pacheco Creek, and that

development and reuse of portions of the Town Center, Bowling Alley, Officers' Club, and Ballfields areas could subject persons to flood hazards in the event of pump failure coincident with the 100-year flood, 100-year high tide, or the combination of these events with storm surges. Three mitigation measures, Water Quality Mitigation 5a, 5b, and 5c, were incorporated into the EIS to reduce this potentially significant impact to a less than significant level. These measures recommended the following: 5a) phasing reuse of planning areas subject to 100-year floods after the completion of the planned new levees west of the airfield, and development set backs from those levees; 5b) as an alternative to levee protection, any new development at sites below 10 feet (mean sea level) should be protected from flooding by raising the base level of developed areas of the site to a minimum of 10 feet (msl); and 5c) the levees shall be fitted with redundant pumping systems and emergency power supply. Subsequent to the approval of the EIS, the levees west of the airfield were constructed and fitted with redundant pumping systems, as well as an emergency power supply. During Phase I of construction of the NHP properties, pursuant to the NHP Master Plan, the Hamilton Storm Water Pump Station was implemented adjacent to the levee system in the southeast portion of the NHP Master Plan Area. A June 13, 1997 Letter of Map Revision (LOMR), which modified the Flood Insurance Rate Map (FIRM) for the area to show the reduction in land area subject to 100-year floods as a result of construction of the levees, was issued by FEMA in accordance with Part 65 of the National Flood Insurance Program (NFIP) regulations. As a result of the modifications to the FIRM, the base flood elevations (BFEs) for the revised reach were removed from the FIRM, and the width of the Special Flood Hazard Area (SFHA) (i.e., the area that would be inundated by the base flood) decreased. According to the LOMR, the Town Center, Bowling Alley, Officer's Club, and Ballfields Planning Areas are no longer located within an area subject to 100-year floods.

The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to the impacts and mitigation measures described above. Following implementation of these measures, no new or additional project impacts related to water-related hazards such as flooding would result.

Discharge into surface waters or alteration of surface water quality, including a wetland (e.g., temperature, dissolved oxygen, turbidity, sediment from construction, hydrocarbons, other contaminants or toxins, and metals from vehicle use or nutrients and pesticides from landscape maintenance): The DODHF Novato Disposal and Reuse EIS states that implementation of the Reuse Plan would not adversely affect any water body. However, the DODHF Novato Disposal and Reuse EIS identifies two surface water quality impacts and mitigation measures related to Rafael Village and the Mainside, respectively. The DODHF Novato Disposal and Reuse EIS states that grading, demolition and construction of new buildings at Rafael Village and the Mainside could result in soil disturbance and increased erosion/sedimentation into local creeks, affecting surface water quality. Water Resources Mitigation 1 (for surface water quality impacts at Rafael Village) and Water Resources Mitigation 4 (for surface water quality impacts at the Mainside) were incorporated into the EIS to reduce these potentially significant impacts to a less than significant level. These mitigation measures recommended development of erosion control plans consistent with the Storm Water Pollution Prevention Plan (SWPPP) required through the National Pollutant Discharge Elimination System (NPDES) prior to any site clearing or grading. The SWPPP should include a best

management practices (BMP) program for stormwater collection as part of the reuse project. The DODHF Novato Disposal and Reuse EIS also states that construction equipment and operations may result in spills and other accidental emissions of pollutants that could enter and contaminate surrounding water bodies; however, this impact is considered less than significant because a spill control and countermeasure plan is required to be included in the SWPPP. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would be subject to the impacts and mitigation measures described above. Following implementation of these measures, no new or additional project impacts related to discharge into surface waters or other alterations of surface water quality would result.

- ' *Changes in the amount of surface water in any water body, including a wetland:* As described in the DODHF Novato Disposal and Reuse EIS, the Reuse Plan would involve reuse of the existing developed area and would not increase surface runoff quantities in any of the Planning Areas. The Reuse Plan would not involve direct discharges into any water body. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to changes in the amount of surface water in any water body.

- ' *Changes in currents, or the course or direction of water movements:* As described in the DODHF Novato Disposal and Reuse EIS, the Reuse Plan would involve reuse of the existing developed area and would not increase surface runoff quantities in any of the Planning Areas. The Reuse Plan would not involve direct discharges into any water body. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to changes in currents, or the course or direction of water movements.

- ' *Change in the quantity or quality of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations, or through substantial loss of groundwater recharge capability; altered direction or rate of flow of groundwater; impacts to groundwater quality; or altered direction or rate of flow of groundwater:* As described in the DODHF Novato Disposal and Reuse EIS, the Reuse Plan would not substantially alter groundwater quantity underlying the site and would not affect the use of local groundwater or groundwater flows on the site. Infiltration of precipitation into the ground water would not be affected substantially. The Redevelopment Plan Project Area includes the NHP

Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to changes in currents, or the course or direction of water movements.

Air Quality

- ' *Exposure of sensitive receptors (e.g., schools, hospitals, parks) to pollutants:* The DODHF Novato Disposal and Reuse EIS identified one impact and mitigation measure related to dust nuisances which may affect sensitive receptors. The EIS states that building, demolition, renovation and construction activities have the potential for creating localized dust nuisance conditions. These activities would occur incrementally over an extended buildout period and would affect existing residences, which would be considered sensitive receptors, adjacent to construction and demolition areas. Air Quality Mitigation 1 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommends several dust control practices. The DODHF Novato Disposal and Reuse EIS identifies no other impacts related to the exposure of sensitive receptors to pollutants. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would be subject to the impacts and mitigation measures described above. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). As a result, a similar amount of construction would occur in the Project Area, which would result in dust impacts on sensitive receptors similar to those determined in the EIS. No new or additional impacts related to the exposure of sensitive receptors to pollutants would result from implementation of the Project.

- ' *Alterations of air movement, moisture, or temperature, or cause any change in climate:* The DODHF Novato Disposal and Reuse EIS does not explicitly address impacts related to alterations of air movement, moisture or temperature, or changes in climate as a result of Reuse Plan implementation. However, the Reuse Plan would not involve land uses or facilities that would alter air movement, moisture, temperature or climate, and would therefore result in no such impacts. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts.

- ' *Creation of objectionable odors:* The DODHF Novato Disposal and Reuse EIS does not address impacts related to objectionable odors. However, the Reuse Plan would introduce no facilities which would be expected to generate objectionable odors. Therefore, the Reuse Plan would result in no impacts. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts.

Transportation/Circulation

- ' *Increased vehicle trips or traffic congestion:* The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to intersection operations or freeway operations as a result of Reuse Plan implementation. The EIS states that the Reuse Plan would result in increases in future intersection traffic volumes as compared to the future Preferred General Plan scenario in the AM peak traffic hour, and decreases in intersection traffic volumes in the PM peak traffic hour. The EIS also states that traffic volumes on U.S. 101 and State Route 37 would decrease under the Reuse Plan when compared to cumulative traffic volumes under the City's Preferred General Plan scenario, but would not decrease enough to eliminate the existing freeway congestion on these freeways. However, these were not considered significant impacts in the DODHF Novato Disposal and Reuse EIS because the Reuse Plan would result in better levels of service than provided under the City's approved Preferred General Plan.

The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). As a result, traffic volumes in the Project Area would be similar to those projected in the EIS. Therefore, the Redevelopment Plan would result in no new or additional impacts. However, due to the elapsed time since the preparation of the EIS transportation/circulation analysis (January 1997), the EIR reevaluates and updates, the cumulative traffic analysis provided in the DODHF Novato Disposal and Reuse EIS (see Section 5.1).

- ' *Hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment):* As described in the DODHF Novato Disposal and Reuse EIS, the Reuse Plan contains Design Guidelines regarding site planning and design, architectural design, landscaping and streetscapes. The Design Guidelines provide recommendations regarding design features to enhance public safety, such as contrasting paving for pedestrian crosswalks, and restricting tree stands along roadways to areas which would not present a public safety hazard. Individual projects proposed in the Project Area would be required to undergo subsequent design

review (and may be required to undergo subsequent environmental review if the Tentative Map/Precise Development Plan process does not conform to the Reuse Plan and Redevelopment Plan), which would ensure that no hazards to safety would result from design features. The Reuse Plan, in itself, would result in no such impacts. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts.

' *Inadequate emergency access or access to nearby uses:* Individual projects proposed in the Project Area would be required to undergo subsequent design review (and may be required to undergo subsequent environmental review if the Tentative Map/Precise Development Plan process does not conform to the Reuse Plan and Redevelopment Plan), which would ensure that no hazards to safety would result from design features. The Reuse Plan, in itself, would result in no such impacts. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts.

' *Insufficient parking capacity on site or off site:* The DODHF Novato Disposal and Reuse EIS does not address impacts related to insufficient parking capacity. The Reuse Plan land use plans and provisions were considered and integrated into the Novato General Plan and are required to comply with all City parking standards; therefore, the Reuse Plan conforms to the General Plan. The location, design, and quantities of parking associated with the approved land uses would be determined during subsequent design review for the individual projects implementing the Reuse Plan. Therefore, the Redevelopment Plan and the Reuse Plan would not result in new or additional impacts related to insufficient parking capacity on site or off site.

' *Hazards or barriers for pedestrians or bicyclists:* The DODHF Novato Disposal and Reuse EIS states that the Reuse Plan would provide a beneficial impact to pedestrians and bicyclists as a result of the construction of continuous, connective and safe pedestrian and bicycle facilities throughout the Project Area. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would also result in beneficial impacts.

' *Conflicts with adopted policies supporting alternative transportation (e.g., bus turnouts,*

bicycle racks): The DODHF Novato Disposal and Reuse EIS identifies one impact and mitigation measure related to conflicts with transit service, and no other impacts related to conflicts with adopted policies supporting alternative transportation. The EIS states that some increase in demand for transit services which would require convenient access for transit to all areas of the Mainside DODHF Property would result from the Reuse Plan. Traffic and Circulation Mitigation 1 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommends construction or improvements to the internal collector roadways at the Mainside to accommodate transit vehicles. The measure also recommends that a service be provided to shuttle people from on-site locations to bus stops on Nave Drive. In addition, the NHP Master Plan, which is included in the Redevelopment Plan in order to implement the reuse and redevelopment of the DODHF Property but is not part of the Agency's proposed CEQA Project, includes the operation of a shuttle bus and transit circulation system with links to Golden Gate Bridge, Highway and Transportation District (GGBHTD) bus lines. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to the impacts and mitigation measures described above. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). As a result, the demand for transit service in the Project Area would be similar to that projected in the EIS. Following implementation of the measure, no new or additional project impacts related to adopted policies supporting alternative transportation would result.

' *Rail, waterborne or air traffic impacts*: The DODHF Novato Disposal and Reuse EIS identifies no impacts related to rail, waterborne or air traffic. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to rail, waterborne or air traffic.

' *Limits to the possibility of future transportation system improvements or expansions*: The DODHF Novato Disposal and Reuse EIS projected future background traffic conditions assuming implementation of local intersection and roadway improvements as identified in the NHP Master Plan and City General Plan. The NHP Master Plan includes several transportation system improvements, including significant improvements to Nave Drive, reconfiguration of the intersection of Ignacio Boulevard at Nave Drive/U.S. 101 on-ramp, and an extension of the auxiliary land on U.S. 101 from the Enfrente Boulevard southbound off-ramp to the U.S. 101 loop off-ramp to Ignacio Boulevard. The City's General Plan identifies several transportation improvements in the project vicinity, including widening U.S. 101 north of Atherton Avenue to six lanes and providing improvements to the intersection of Ignacio Boulevard at the Nave Drive/U.S. 101 on-ramp. The Reuse Plan would not affect implementation of any of these anticipated transportation system improvements. The Reuse Plan also includes several internal transportation system improvements. The portions of DODHF

Property subject to the Reuse Plan include the 201.07-acre Mainside and 107.2-acre Rafael Village Planning Area. Land uses and facilities proposed under the Reuse Plan would be confined within these built-out areas, and would not substantially affect transportation system improvements outside these areas. Therefore, the Reuse Plan would not significantly limit the possibility of additional future transportation system improvements or expansions. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to limitations to future transportation system improvements or expansions.

Biological Resources

- ' *Impacts on endangered, threatened, or rare species or their habitats (including but not limited to plants, fish, insects, mammals, reptiles, and birds):* The DODHF Novato Disposal and Reuse EIS identifies one impact and mitigation measure related to sensitive species and sensitive habitat, and no other impacts related to endangered, threatened or rare species or their habitats. The EIS states that demolition and construction activities would increase the potential for erosion at the site, which could result in impacts to sensitive wetland and riparian habitats in San Jose Creek adjacent to the southern boundary of Rafael Village and other wetlands habitats, as well as sensitive species which inhabit these areas. Biological Resources Mitigation 1 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommends the implementation of standard erosion control measures to minimize sedimentation into creeks and other wetlands during new construction. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to the impacts and mitigation measures described above. Following implementation of this measure, no new or additional project impacts related to endangered, threatened or rare species or their habitats would result.

- ' *Impacts on locally designated species or specimens (e.g., heritage trees) currently present or likely to occur at any time throughout the year:* The DODHF Novato Disposal and Reuse EIS identifies no impacts related to locally designated species or specimens. Any construction or demolition activities would occur in previously developed or landscaped areas. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts

related to locally designated species or specimens.

- ' *Impacts on locally designated native and natural communities (e.g., oak woodlands, bay/riverfront, wetland, riparian habitats, meadows, chaparral, grasslands, serpentine endemics, etc.) or wetland habitat (e.g., fresh and saltwater marsh, riparian, seasonal or perennial wetlands, creek habitats, and vernal pools):* The DODHF Novato Disposal and Reuse EIS states that no adverse impacts would be expected in the upland sensitive habitats (valley oak woodland and California bay forest) in and near DODHF Novato. Reuse activities would not occur within these areas and the existing uses of these areas would not change. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to locally designated natural communities.

- ' *Impacts on wildlife dispersal, wildlife habitats, movement, or migration corridors:* The DODHF Novato Disposal and Reuse EIS identifies no impacts related to wildlife dispersal, habitats, movement or migration corridors. Any construction or demolition activities would occur in previously developed or landscaped areas. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to wildlife dispersal, habitats, movements or migration corridors.

- ' *Impacts on native species by the introduction of exotic plants and/or animals:* As described in the DODHF Novato Disposal and Reuse EIS, the Reuse Plan provides a general description of future land uses at DODHF Novato and outlines a project specific planning process that will occur as part of Reuse Plan implementation. The Reuse Plan does not address landscape design, including the potential introduction of exotic plants, at a level of detail which would facilitate a determination as to the significance of effects related to specific plant species. Proposals for individual projects pursuant to the Reuse Plan and implemented through the Redevelopment Plan would include specific landscape palettes. Development proposals within the Redevelopment Project Area that request use of exotic plants would be required to undergo separate design review (and may be required to undergo subsequent environmental review if the Tentative Map/Precise Development Plan process does not conform to the Reuse Plan and Redevelopment Plan), which would include a review of landscaping plans. Neither the Reuse Plan nor the Redevelopment Plan propose the introduction of exotic species of plants or animals. Therefore, the Project would result in no new or additional impacts related to the introduction of exotic plants and/or animals would result.

Energy and Mineral Resources

- ' *Conflict with adopted energy conservation plans:* Any future development constructed within the

Redevelopment Plan shall be subject to State Title 24 Energy Regulations, which establishes energy performance building code requirements that the City follows and implements. Therefore, the Project would not conflict with adopted energy conservation plans, and no new or additional impacts would result.

- ' *Increased demand on existing energy sources and/or non-renewable resources in a wasteful and inefficient manner:* The DODHF Novato Disposal and Reuse EIS states that the Reuse Plan would not require significant commitments of nonrenewable energy and material resources because the majority of the Reuse Plan would result in the adaptive reuse of existing structures. The Reuse Plan would not use non-renewable resources in a wasteful or inefficient manner. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to existing energy sources or non-renewable resources.

- ' *The loss of availability of a known natural resource that would be of current or future value to the region and residents of the state:* The DODHF Novato Disposal and Reuse EIS does not address impacts to mineral resources as a result of implementation of the Reuse Plan. The primary extractive resources in and around the Novato area are sand and gravel. The State Division of Mines and Geology has designated three sites as Resource Sectors in the Novato area in Black Point, Burdell Mountain, and Bowman Canyon. The Project Area is not located within any one of these three Resource Sectors. Therefore, the Reuse Plan would not affect known mineral resources and less than significant impacts would result. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to mineral resources.

Hazards

- ' *Possible interference with an emergency response plan or emergency evacuation plan:* The DODHF Novato Disposal and Reuse EIS identifies no impacts related to interference with an emergency response plan or emergency evacuation plan. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to interference with an emergency response plan or emergency evacuation plan.

- ' *The creation of any health hazard or potential health hazard:* The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to hazardous materials management on the site. The EIS states that the quantity of hazardous materials used, stored, and disposed under the Reuse Plan likely would decrease compared to current conditions, although specific uses and chemicals are not known. Future uses would be tightly controlled under current regulations. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to the creation of any health hazard or potential health hazard.

- ' *Increased fire hazards in areas with flammable brush, grass or trees:* As described in the DODHF Novato Disposal and Reuse EIS, any construction or demolition activities would occur in previously developed or landscaped areas. Therefore, the Project would result in no impacts related to increased fire hazards. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to increased fire hazard.

Noise

- ' *Increases in existing noise levels:* The DODHF Novato Disposal and Reuse EIS identifies one impact and mitigation measure related to increases in existing noise levels. The EIS states that building demolition, renovation and construction activities associated with reuse of the Rafael Village, Commissary Triangle and Exchange Triangle planning areas would cause temporary noise disturbances to adjacent land uses. Noise Mitigation 1 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommended limited the use of heavy construction equipment and outdoor power tools to normal daytime hours (7 AM to 7 PM) during construction and demolition activities. Implementation of Noise Mitigation 1 would also mitigate noise impacts associated with building demolition, renovation and construction activities at all other DODHF planning areas, including the Capehart/Hillside Housing Planning Area. The EIS states that traffic added by the Reuse Plan would not cause any significant change in ambient noise levels. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would be subject to the impacts and mitigation measures described above. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of

dwelling units permitted under the Reuse Plan (1,208 units). Since the Redevelopment Plan would result in no housing units in addition to those permitted under the Reuse Plan, traffic volumes in the Project Area would be similar to those projected in the EIS. As a result, implementation of the Redevelopment Plan would result in an increase in ambient noise levels similar to that described in the EIS. Following implementation of the EIS measure, no new or additional project impacts related to increases in existing noise levels would result.

Public Services

- ' *Effects upon, or a need for new or altered government services in any of the area of fire protection:* The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to fire protection and emergency medical services. The EIS states that the number of service calls received can be expected to increase as the population of the site increases; however, the increase in demand for services would occur gradually during buildout. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). As a result, population in the Project Area, and the associated demand for fire protection services would be similar to that projected in the EIS. Therefore, the Project would result in no new or additional impacts related to increased fire protection.

- ' *Effects upon, or a need for new or altered government services in any of the area of police protection:* The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to police protection. The EIS states that police services on the site in the future would require additional personnel as the population of the site increases; however, the additional personnel and equipment could be paid for by taxes generated by the new development and the increase in demand for services would occur gradually during buildout. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). As a result, population in the Project Area, and the associated demand for police services would be similar to that projected in the EIS. Therefore, the Project would result in no new or additional impacts related to increased police protection.

- ' *Effects upon, or a need for new or altered government services in any of the area of schools:* The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to school services. The EIS states that the Reuse Plan would result in up to 201 additional students attending

Novato Unified School District (NUSD) schools each year over the 25-year plan period; however, since most schools in the NUSD are substantially below capacity, the Reuse Plan would not result in an exceedance of capacity. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). As a result, population in the Project Area, and the associated demand for school services would be similar to that projected in the EIS. Therefore, the Project would result in no new or additional impacts related to school services.

' *Effects upon, or a need for new or altered government services in any of the area of maintenance of public facilities, including roads:* The DODHF Novato Disposal and Reuse EIS identifies no impacts related to the need for new or altered government services in the area of maintenance of public facilities. However, it can be expected that increased maintenance of public facilities would be necessary as the population of the site increases. Nevertheless, the increase in the need for maintenance of public facilities would occur gradually during buildout and this would be considered a less than significant impact. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. The number of dwelling units proposed under the Redevelopment Plan would not exceed the maximum number of dwelling units permitted under the Reuse Plan (1,208 units). As a result, population in the Project Area, and the associated demand for public facilities, including roads, would be similar to that projected in the EIS. Therefore, the Project would result in no new or additional impacts related to the maintenance of public facilities.

' *Effects upon, or a need for new or altered government services in any of the area of other governmental services:* The DODHF Novato Disposal and Reuse EIS identifies no impacts related to the need for other new or altered government services. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to the need for other new or altered government services.

Utilities and Service Systems

' *Need for new systems, supplies or substantial alterations to power or natural gas:* The DODHF

Novato Disposal and Reuse EIS identifies no significant impacts related to power or natural gas. The EIS states that the proposed upgrading of electrical and natural gas systems to meet current Pacific Gas and Electric (PG&E) standards would have no significant environmental impacts. PG&E has indicated that it has adequate capacity to serve potential future site users under the Reuse Plan. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to power or natural gas.

- ' *Need for new systems, supplies or substantial alterations to communications systems:* The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to communications systems. The EIS states that the proposed upgrading of telephone systems to meet current Pacific Bell standards would have no significant environmental impacts. Pacific Bell has indicated that it has adequate capacity to serve potential future site users under the Reuse Plan. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to communications systems.

- ' *Need for new systems, supplies or substantial alterations to local or regional water treatment or distribution facilities:* The DODHF Novato Disposal and Reuse EIS states that proposed upgrading of the distribution system to meet current North Marin Water District and Marin Municipal Water District standards, and the proposed upgrading of the sanitary sewer collection system to meet current Novato Sanitary District standards would have no significant environmental impacts. The EIS further states that the Reuse Plan would result in levels of residential and commercial development nominally equivalent to existing conditions, so that a significant increase in wastewater generation or water demand would not be anticipated. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to local or regional water treatment or distribution facilities.

- ' *Need for new systems, supplies or substantial alterations to sewer or septic tanks:* The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to sanitary sewer systems. The EIS states that the proposed upgrading of the sanitary sewer collection system to meet current Novato Sanitary District standards would have no significant environmental impacts. The EIS further states that the Reuse Plan would result in levels of residential and commercial

development nominally equivalent to existing conditions, so that a significant increase in wastewater generation would not be anticipated. The Reuse Plan Project Area is served exclusively by a sanitary sewer system; therefore the Reuse Plan would not affect septic tanks. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to sanitary sewer systems and septic tanks.

' *Need for new systems, supplies or substantial alterations to storm water drainage:* The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to the storm water drainage system. The EIS states that the proposed upgrading of the storm drainage system to meet current City of Novato criteria would have no significant environmental impacts. Future exact or specific storm drainage runoff would depend on the type of future site users and the nature of the potential contaminants related to these operations. Proposals for individual projects pursuant to the Reuse Plan and implemented through the Redevelopment Plan would be required to undergo separate design review (and may be required to undergo subsequent environmental review if the Tentative Map/Precise Development Plan process does not conform to the Reuse Plan and Redevelopment Plan), which would include a review of storm water drainage plans. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to storm water drainage.

' *Need for new systems, supplies or substantial alterations to solid waste disposal:* The DODHF Novato Disposal and Reuse EIS identifies one impact and mitigation measure related to solid waste disposal. The EIS states that the addition of waste to the countywide waste stream would contribute to nonattainment of solid waste reduction goals. Utilities Mitigation 1 was incorporated into the EIS to reduce this potentially significant impact to a less than significant level. This mitigation measure recommends that an informal base closure team organized with California Integrated Waste Management Board (CIWMB) staff and others examine the issues and identify projects that could assist counties involved in base closures. The Novato Sanitary District estimates that families occupying housing in the planning areas upon reuse will generate less waste destined for landfills than that generated by military families under baseline conditions, resulting in no significant impact. The demolition of existing unwanted buildings and pavement at Rafael Village would create large quantities of construction and demolition debris that would be disposed in the Redwood Landfill. However, the EIS states that the addition of this material would not measurably shorten the expected life of the Redwood Landfill, resulting in no significant impact. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this

EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to the impacts and mitigation measures described above. Following implementation of this measure, the Project would result in no new or additional impacts related to solid waste disposal.

Need for new systems, supplies or substantial alterations to local or regional water supplies: The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to alterations to local or regional water supplies. The proposed upgrading of the distribution system to meet current North Marin Water District and Marin Municipal Water District standards would have no significant environmental impacts. The EIS further states that the Reuse Plan would result in levels of residential and commercial development nominally equivalent to existing conditions, so that a significant increase in water consumption would not be anticipated. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to alterations to local or regional water supplies.

Aesthetics

Affect a scenic view or vista open to the public and/or scenic qualities along Highways 101 and 37: As described in the DODHF Novato Disposal and Reuse EIS, the majority of the Reuse Plan area is not visible from Highways 101 and 37 due to intervening structures, topography and vegetation. However, portions of Mainside would be visible from Highway 101. The EIS states that visual impacts associated with demolition and construction would be minimal and would not be considered significant because they would be of a short duration. Further, the EIS states that long-term changes to the visual character of the Planning Areas would be beneficial due to the increased emphasis on urban design guidelines within the Reuse Plan. Urban design guidelines were adopted as part of the Reuse Plan (Section 8). These guidelines include goals and policies that would establish a cohesive design plan and ensure that the aesthetic quality of Hamilton Airfield is retained. Therefore, the Reuse Plan would result in less than significant impacts. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to scenic views or vistas open to the public and/or scenic qualities along Highways 101 and 37.

Have a demonstrable negative aesthetic effect: The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to negative aesthetic effects. The EIS states that visual impacts associated with demolition and construction would be minimal and would not be considered significant because they would be of a short duration. The EIS also states that the eventual rebuilding of the Rafael Village Planning Area would result in beneficial impacts to visual resources because

the new residential area would appear similar to the surrounding residential areas. Any new construction at the Mainside would also be consistent with the Novato General Plan, local specific plans and design reviews. Long-term changes to the visual character of the non-housing planning areas would be beneficial due to the increased emphasis on urban design guidelines within the Reuse Plan. Urban design guidelines were adopted as part of the Reuse Plan. These guidelines include goals and policies that would establish a cohesive design plan and ensure that the aesthetic quality of Hamilton Airfield is retained. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to negative aesthetic affects.

Create sun shadow, light or glare problems: As described in the DODHF Novato Disposal and Reuse EIS, implementation of the Reuse Plan would involve the reuse of the majority of on-site structures. The 503 vacant dwelling units within Rafael Village would be demolished and replaced with a reduced number of residences, which may alter shadow, light and glare from on-site structures. The Reuse Plan does not address building design at a level of detail which would facilitate a determination as to the significance of effects related to shadows, light and glare. Individual projects implementing the Reuse Plan may result in localized increases in shadows, light and glare. Individual projects proposed within the Reuse Plan and Redevelopment Plan would be required to complete a design review process (and may be required to undergo subsequent environmental review if the Tentative Map/Precise Development Plan process does not conform to the Reuse Plan and Redevelopment Plan) prior to individual project implementation. Therefore, the Reuse Plan, in itself, would result in less than significant impacts related to shadows, light and glare. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in ne new or additional impacts related to shadow, light and glare effects.

Cultural Resources

Disturb or affect paleontological, archaeological, cultural, or historical resources: The DODHF Novato Disposal and Reuse EIS identifies no significant impacts related to cultural resources. The EIS states that implementation of the Reuse Plan would be restricted in a manner that assures the continued preservation of those characteristics that qualify historic properties located on the site for inclusion on the National Register of Historic Places, thereby avoiding any significant impact. In May 1997, subsequent to the preparation of the EIS, the State Historic Preservation Office (SHPO) determined that due to demolition and modification of contributing structures to the Hamilton Army Airfield Historic District during implementation of the NHP Master Plan, the historic character and integrity of the District had been compromised. Therefore, the District, as a whole,

is no longer eligible for the National Register of Historic Places. Nevertheless, several buildings constructed on the base between 1931 and 1937 and the original, permanent Spanish-style housing areas remain intact and qualify for inclusion in the National Register of Historic Places as a discontinuous district. This district includes portions of the Spanish Housing and Town Center Reuse Planning Areas, the Officer's Club and portions of the NHP Master Plan Area. A letter of concurrence with the Department of the Navy's delineation of the discontinuous district was issued by SHPO in May 1997. As described in the EIS, the National Park Service will incorporate conditions into the conveyance documents for portions of the district to assure preservation of the historic character of historic facilities. Should the historic properties not be transferred under the National Park Service Programs, the Navy would further consult with SHPO and the ACHP pursuant to Section 106 of the National Historic Preservation Act. As a result no significant impacts related to historical resources would occur. In addition, the EIS states that no significant impacts to subsurface prehistoric and historic archaeological resources or noncontributing structures would occur under the Reuse Plan. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS would be subject to less than significant impacts similar to the impacts described above. Therefore, no new or additional project impacts related to paleontological, archaeological, cultural, or historical resources would result.

' *Restrict existing religious or sacred uses within the potential impact area:* Impacts on existing religious or sacred uses within the potential impact area are not explicitly addressed in the DODHF Novato Disposal and Reuse EIS. The existing Chapel located in the Town Center Planning Area would remain a Chapel under the Reuse Plan, and would not be affected as a result of implementation of the Reuse Plan. The Nativity of Christ Greek Orthodox Church is located north of Rafael Village. No other religious or sacred uses are located in the vicinity of the Reuse Plan Project Area. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to the restriction or existing religious or sacred uses.

Recreation

' *Increase the demand for neighborhood or regional parks or other recreational facilities:* As discussed in the DODHF Novato Disposal and Reuse EIS, implementation of the Reuse Plan would add approximately 52 acres of neighborhood park facilities and 114 acres of open space. As the population of the site increases, it can be expected that the demand for neighborhood or regional parks would also increase. Since all of the neighborhoods within Novato are considered to be underprovided with parks, this expansion of recreational facilities would be considered a beneficial impact. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the

Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to increased demand for neighborhood or regional parks.

- ' *Affect existing recreational opportunities:* As discussed in the DODHF Novato Disposal and Reuse EIS, existing recreational facilities on the Reuse Plan Project Area would be reused. For example, the Bowling Alley and ballfields would be reused as recreational facilities. Reuse of existing recreational facilities would result in a less than significant impact related to existing recreational opportunities. The Redevelopment Plan Project Area includes the NHP Master Plan Area and the Planning Areas analyzed in the DODHF Novato Disposal and Reuse EIS as shown on Exhibit 1-1. Development of the NHP Master Plan Area in accordance with the NHP Master Plan was previously evaluated in the *Hamilton Field Project Final Subsequent EIR* and requires no further environmental analysis (refer to Section 4.5 of this EIR for further details). Redevelopment and reuse of the DODHF Novato Property was analyzed in the DODHF Novato Disposal and Reuse EIS and would result in impacts similar to those described above. Therefore, the Project would result in no new or additional impacts related to existing recreational facilities.

The Initial Study/NOP noted that for each of these issue areas, the PA, DA and OPA with the Master Developer will serve as the legally binding mechanisms by which to implement the land uses, facilities and improvements proposed under the adopted Reuse Plan and would result in no new environmental impacts other than those described in the previously prepared EIS (June 1998) for the Reuse Plan. Therefore, no additional environmental impacts associated with these actions were identified and no mitigation measures were required beyond those required as part of the EIS.

1.4 **TERMINOLOGY USED IN THE EIR**

The EIR uses the following terminology to denote the significance of environmental impacts of the proposed CEQA Project:

- ' An “*environmental impact*” is a direct or indirect effect that would be caused by the project that constitutes a physical change to the existing natural or man-made conditions within the area affected by the project.
- ' A “*less than significant*” impact or an impact that is “not significant” would cause no substantial adverse change in the environment. As such, no mitigation is required.
- ' A “*potentially significant*” or “*significant*” impact could or would cause a substantial adverse change in the environment. In this case, an impact has been identified which, although potentially significant, can be reduced or avoided to less than significant levels through various means of

mitigation. Such mitigation may include project design features that have been incorporated into the project to reduce or avoid the potentially significant impact. They can also include existing requirements, such as City Codes and Ordinances, engineering and design requirements (such as the Uniform Building Code) and standard regulations set by regional, state and federal agencies.

- ' A “*significant and unavoidable*” impact is one that could or would cause a substantial adverse change in the environment and cannot be avoided if the project is implemented; mitigation may be recommended, but it cannot feasibly reduce the impact to a less-than-significant level.

- ' An “*environmental equivalent*” means a procedure or measure, subject to the approval of the City, which will accomplish the same result and will have the same or less effect on the environment.

The EIR also identifies mitigation measures, defined in the State CEQA Guidelines § 15370 as:

- a. avoiding the impact altogether by not taking a certain action or parts of an action;
- b. minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- c. rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- d. reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and,
- e. compensating for the impact by replacing or providing substitute resources or environments.

1.5 OTHER AGENCIES THAT MAY USE THE EIR

This EIR is intended to be used by responsible and trustee agencies (as defined by §§ 15381 and 15386 of the State CEQA Guidelines) that may have review or discretionary authority over the proposed CEQA Project, or some component of the project thereof. Agencies in addition to the Lead Agency which also may use this Draft EIR in their review of the Project or which may have responsibility over approval of certain Project elements may include, but are not limited to the following:

- ' State Department of Health, Toxic Substances Control Division (DTSC)
- ' California Department of Transportation (Caltrans)
- ' California Regional Water Quality Control Board (RWQCB)
- ' Bay Area Air Quality Management District (BAAQMD)
- ' U.S. Army Corp of Engineers (ACOE)
- ' Pacific Gas and Electric Company (PG&E)
- ' County of Marin Local Agency Formation Commission (Marin LAFCO)
- ' California Department of Fish and Game (CDFG)
- ' State of California Office of Planning and Research (OPR)
- ' City of Novato Public Finance Authority (NPFA)

Other agencies, organizations and/or special interest groups not formally identified as a responsible agency, but otherwise anticipated to be participants in the local review process for this Project include:

- ' City of Novato
- ' California Environmental Protection Agency (Cal EPA)
- ' State of California State Lands Commission
- ' Association of Bay Area Governments (ABAG)
- ' U.S. Fish and Wildlife Service (USFWS)
- ' State Historic Preservation Office (SHPO)
- ' State Office of Historic Preservation (SHPO)

1.6 PUBLIC REVIEW PROCESS

Pursuant to the State CEQA statute and Guidelines (§§ 21083.8.1 and 15229, respectively), the Agency identified pertinent responsible agencies and trustee agencies and consulted with those agencies as to the application of their regulatory policies and permitting standards to the proposed baseline for environmental analysis, and to the reuse plan and planned future non-military land uses of the base. This included the circulation of a Notice of Preparation (NOP) in compliance with the State CEQA Guidelines § 15082 on November 9, 1998. In compliance with the provisions of CEQA, the affected agencies had at least 30 days prior to a public hearing/public scoping meeting to review the proposed reuse plan and to submit their comments to the Agency. Representatives from various agencies, including the Novato Fire Protection District (NFPD), Association of Bay Area Governments (ABAG), Golden Gate Bridge, Highway and Transportation District (GGBHTD) and County of Marin Local Agency Formation Commission (Marin LAFCO) have communicated via telephone, in writing or attended the public scoping meetings held on December 14, 1998 and January 11, 1999. Where appropriate, comments received from these agencies have been addressed in this EIR. The NOP and brief responses to comments received from public agencies and interested parties on the NOP are contained in Appendix A.

As noted above, the City of Novato Planning Commission held public scoping meetings on December 14, 1998 and January 11, 1999 to discuss the federal environmental impact statement (EIS) that was previously prepared for the Hamilton Army Airfield Disposal and Reuse Project, including the significant effects on the environment that were examined in the environmental impact statement, potential methods of mitigating those effects, including feasible alternatives, and the mitigative effect of federal, state and local laws applicable to nonmilitary activities. The specific physical conditions to be examined in greater detail in this EIR than were examined in the federal EIS were discussed. Pursuant to the State CEQA statute and Guidelines as noted above, it was also the Agency's intent to disclose during the course of the public hearing, and as was disclosed in the Notice of Preparation (NOP) distributed on November 9, 1998, that the Agency intends to utilize the previously prepared EIS as a Draft EIR. As such, the Agency requested comments from the public

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on whether, and to what extent, the EIS provides adequate information to serve as a Draft EIR, and what specific information, if any, is necessary to comply with CEQA. Notices of the availability of the NOP and related scoping meeting were published in the newspaper and mailed to nearby property owners. The scoping meeting also provided an opportunity for public input regarding the environmental concerns that should be addressed in the EIR.

This Draft EIR has been distributed to Responsible Agencies, other affected agencies, and interested parties. The Notice of Availability of the Draft EIR has been distributed as required by CEQA, including publication in the newspaper. The notice of availability commences a 45-day public review period. During the 45-day public review period, the Draft EIR, including appendices, is available for review at the Redevelopment Agency of the City of Novato, 901 Sherman Avenue, Novato, California 94945, and the Marin County Free Library, Novato Branch, 1720 Novato Boulevard, Novato, California 94945.

In reviewing a Draft EIR, readers should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.

Comments may be made on the Draft EIR in writing on or before the end of the comment period. Comments may also be made verbally at the public hearing. Following the close of the comment period, responses to comments on the Draft EIR will be prepared and published as a separate document. The Final EIR text and technical appendices, together with the Draft EIR comments and written responses to comments will constitute the Final EIR. Written comments on the Draft EIR should be sent to:

Redevelopment Agency of the City of Novato
901 Sherman Avenue
Novato, California 94945
Contact: Sonia Seeman, Deputy City Manager
(415) 897-4341