

## SECTION 2 PROJECT APPROACH

### 2.1 DOCUMENT PURPOSE

An Environmental Impact Statement (EIS) for the disposal and reuse of the Hamilton Air Force Base (Department of Defense Housing Facility {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 (ROD) was filed in June 1998. The EIS evaluated the potential environmental impacts that would be associated with the disposal and reuse of the DODHF Novato facility. In accordance with the California Environmental Quality Act (CEQA), Public Resources Code §21000 *et seq.*, and the State CEQA Guidelines, California Code of Regulations §15000 *et seq.*; an Environmental Impact Report (EIR) is also required to be prepared for the disposal and community reuse of the DODHF Novato facility. In order to avoid duplication of environmental analysis, CEQA statute, §21083.8 (b)(2) encourages the use of an EIS or information in an EIS as all or part of the draft EIR. Pursuant to §21083.8 (b)(2), the Redevelopment Agency of the City of Novato intends to use the EIS for the DODHF Novato facility as part of the Draft EIR. Therefore, this Draft EIR consists of all of the information included within the previously prepared EIS together with the additional information included within this Draft EIR document.

In addition, Public Resources Code §21083.8 (b)(1) requires that the Redevelopment Agency determine, through public comment on the Notice of Preparation (NOP), whether the DODHF Novato Disposal and Reuse EIS provides adequate information to serve as a Draft EIR, and what specific additional information, if any, is necessary to comply with this division. In compliance with §21083.8 (b)(1), the Redevelopment Agency prepared an NOP and Initial Study for the Hamilton Army Airfield Reuse Plan and Redevelopment Plan. The Agency has also worked in conjunction with the City and Authority to prepare conceptual forms of a Development Agreement, Owner Participation Agreement, and Negotiated Purchase and Sale Agreement to be used to finalize the terms and conditions of the sale of the DODHF property to a Master Developer for rehabilitation and development of that area. The NOP was distributed for public review on November 9, 1998. A description of the Reuse Plan and a copy of the Executive Summary of the DODHF Novato Disposal and Reuse EIS was included within the Notice of Preparation for the Draft EIR indicating the Agency's desire to utilize the DODHF Novato Disposal and Reuse EIS as a Draft EIR.

A public hearing was held on December 14, 1998 and continued to January 11, 1999 at Novato Community House, Council Chambers to receive oral and written comments regarding these issues. Based on comments received from pertinent responsible and trustee agencies, groups and individuals, the Agency determined that the DODHF Novato Disposal and Reuse EIS would provide adequate information to serve as a Draft EIR for the following issues: land use, aesthetics/scenic resources, socioeconomics, public services, utilities,

cultural resources, biological resources, geology and soils, and water resources. The Agency further determined that additional information would be necessary for the EIS to adequately serve as a Draft EIR for several resource issues. The Agency, in consultation with responsible and trustee agencies, groups and individuals, identified the issues to be examined in this Draft EIR in greater detail than were examined in the DODHF Novato Disposal and Reuse EIS as the following:

- ' Cumulative Traffic Impacts
- ' Air Quality Impacts
- ' Project Noise Impacts
- ' Hazardous Materials Impacts

As such, pursuant to the CEQA statute, §21083.8 (b)(2), this Draft EIR consists of all of the EIS and the additional information that is necessary to prepare a Draft EIR in compliance with this division. Additional information necessary to ensure compliance with the CEQA statute includes the following:

- ' Project Objectives
- ' Areas of Controversy
- ' Alternatives Analysis
- ' Growth-Inducing Impacts
- ' Irreversible and Irrecoverable Commitment of Resources
- ' Effects Found Not to Be Significant

The impact analysis for these issue areas has been revised and/or validated, as appropriate, in this Draft EIR. These issues are being assessed due to changes in cumulative traffic conditions as a result of development which has occurred or has been proposed subsequent to the preparation of the DODHF Novato Disposal and Reuse EIS cumulative traffic impacts analysis (January 1997), changes in regional air quality regulations since the preparation of the Disposal and Reuse EIS air quality analysis, additional opportunities to mitigate noise impacts, and continuing hazardous materials characterization and remediation since the preparation of the Disposal and Reuse EIS hazardous materials impacts analysis. ***A complete summary of the Disposal and Reuse EIS is included in Section 2.5 of this document.***

The Draft EIR describes the inclusion of the NHP Master Plan Area, including the San Pablo Avenue Site, into the Project Area, but does not address the physical impacts associated with the community reuse of the NHP Master Plan Area for two (2) reasons: first, the Redevelopment Project will not result in any new activities, actions or projects in the NHP Master Plan Area; second, the effects of development in the NHP Master Plan Area have been adequately analyzed in previous EIRs, including the *Hamilton Field Project Final Subsequent EIR* (March 1993) and addenda thereto (refer to Section 2.6, Other Related References; in addition, refer to Section 4.5 of this EIR for a summary of the NHP Master Plan CEQA documents). However, the Cumulative Impacts analysis for the Hamilton Field Redevelopment Project addresses the

environmental effects associated with reuse and redevelopment of the DODHF Novato Property together with implementation of the NHP Master Plan Area (refer to Section 6 of this EIR). In addition, the Disposal and Reuse EIS analyzed the development of the NHP Master Plan Area in accordance with the NHP Master Plan as a cumulative project in the Disposal and Reuse EIS Cumulative Impacts evaluation. Refer to Table 3-1 for a summary of previous environmental analyses conducted for areas within the Project Area.

The fiscal effects on the City of Novato of implementing the Reuse Plan would not be considered significant, pursuant to State CEQA Guidelines § 15131(a), and are, therefore, not considered additional information, pursuant to CEQA §21083.8 (b)(1), needing to be included in the Draft EIR. However, the financial feasibility and fiscal impacts associated with implementation of the Reuse Plan were addressed as part of the Reuse Plan preparation process. The assessment and key findings of financial feasibility for the Reuse Plan are contained in the Appendix of the Reuse Plan (October 1995, Revised November 1996). The Reuse Plan requires that the Property's development be fiscally sound and that it not burden the fiscal resources of the City of Novato. To ensure that a financial burden on the City would not occur with implementation of the Reuse Plan, a financing plan for funding municipal service costs will be required of the selected Master Developer for the site.

State CEQA Guidelines § 15131(a) states that the economic or social effects of a Project are not treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a Project through anticipated economic or social changes resulting from the Project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. Thus, the focus of the analysis herein is on the physical changes that would be anticipated with site reuse, not the fiscal or economic effect. As noted above, the fiscal and economic effects anticipated with implementation of the Reuse Plan can be found in the Appendix of the Reuse Plan (October 1995, Revised November 1996). Additionally, the socioeconomic impacts associated with Disposal and Reuse of the DODHF Novato Property, including impacts on jobs, income, population, housing, schools, recreation and environmental justice, are analyzed in Section 4.3 of the Disposal and Reuse EIS.

## **2.2 USE OF THE EIR**

The City of Novato and the Redevelopment Agency will utilize the EIR for implementation of the Hamilton Field Redevelopment Project. This EIR is intended to provide a program-level analysis of the potential environmental impacts resulting from Navy disposal and community reuse of DODHF Novato that were not evaluated in the EIS. The EIR is not intended to provide information on site-specific development options. When site-specific development plans are submitted, the necessary level of Project description, detail and associated analysis of environmental effects required for CEQA compliance will need to be reviewed and

verified to ensure that its effects have been considered within the environmental thresholds and parameters established by this EIR. Developments that do not require additional discretionary review will not be subject to any additional environmental documentation. However, in all cases, the Master Developer will be required to submit documentation substantiating that said development is allowed and in conformance with the Reuse Plan, Redevelopment Plan, and other implementing activities of the City and Redevelopment Agency, and that their environmental effects are within the parameters and time frame analyzed within the Program EIR.

Future developments that require discretionary review (e.g., amendments to the Reuse Plan, Conditional Use Permit, etc.) may require subsequent environmental review in compliance with the State CEQA Guidelines unless the City finds, after preparing an Initial Study, (1) that the subsequent Project is within the scope of this Program EIR, (2) that the Project will not cause any additional significant effects on the environment not described in this Program EIR, and (3) that no new or additional mitigation measures or alternatives are required to mitigate the subsequent Project's significant environmental impacts. This EIR will be the base document by which the need for subsequent environmental review for approvals not specifically addressed in this EIR will be determined and measured.

Subsequent to the disposal of DODHF Novato by the Navy to the NPFA, no additional NEPA review will be required. The DODHF Novato Disposal and Reuse EIS satisfied all NEPA requirements for the Reuse Plan adoption.

### **2.3 PROJECT TERMINOLOGY**

The terms "Hamilton Air Force Base" and "Hamilton Army Airfield" are often used interchangeably to refer to the entire facility before it was divided among different Department of Defense and federal entities. This EIR uses "the former Hamilton Air Force Base" when referencing the entire facility. Throughout the EIR, the term "Project" is used to describe the proposed Hamilton Field Redevelopment Project, including the disposal and reuse of the Navy-owned DODHF Novato properties at Hamilton Army Airfield together with certain infrastructure and public improvements on the DODHF properties which will benefit the NHP properties, pursuant to the previously adopted Reuse Plan, the adopted Redevelopment Plan, and three legally binding agreements; a Negotiated Purchase and Sale Agreement (PA), a Development Agreement (DA) and an Owner Participation Agreement (OPA) to be entered into by the Master Developer for the DODHF properties. The term "Project Area" is used in this EIR to describe the Navy-owned portions of DODHF Novato Property, which consists of approximately 300+acres and includes Rafael Village and portions of Mainside, as well as the 421-acre New Hamilton Partnership (NHP) Master Plan Area. This EIR uses the term "DODHF Property" to describe the Project Area defined above, exclusive of the NHP Master Plan Area. The terms "DODHF Novato Disposal and Reuse EIS," "Disposal and Reuse EIS," and "EIS" are used interchangeably in this EIR, unless otherwise specified.



## 2.4 SELECTION OF THE BASELINE FOR ANALYSIS

### *BACKGROUND INFORMATION*

Pursuant to §21083.8.1(b)(1), *Baseline Provisions*, of the State CEQA statute, when preparing and certifying an environmental impact report for a reuse plan, including when utilizing an environmental impact statement pursuant to §21083.5, in addition to the procedure authorized pursuant to subdivision (b) of §21083.8, the determination of whether the reuse plan may have a significant effect on the environment may be 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. DODHF Novato was closed on September 30, 1996 pursuant to the Defense Base Closure and Realignment Act (Public Law 101-510) of 1990, as implemented by the base closure process of 1993. The portion of DODHF Novato known as Rafael Village housing area was closed on September 30, 1995.

It should be noted that pursuant to §15229(b) of the State CEQA Guidelines, the no-project alternative analyzed in this EIR and prepared under this section of the CEQA guidelines discusses the conditions on the base as they existed at the time of EIR preparation, as well as what could be reasonably expected to occur in the foreseeable future if the Reuse Plan were not implemented, based on current plans and consistent with available infrastructure and services.

The DODHF Novato Disposal and Reuse EIS was completed in June of 1998, rendering the environmental analysis of the issues examined therein recent and reflective of current environmental thresholds, regulatory authority and permitting standards. It should be noted that the Reuse Plan was previously completed and adopted by the City of Novato (October 1995, amended November 1996), and therefore is not a document that is being proposed, is in progress, or is in various stages of completion. It is a completed document that is now subject to implementation based on the mechanisms outlined in the adopted Redevelopment Plan (Ordinance 1394, as amended by Ordinance 1401). The “reuse planning process” as defined by CEQA, is substantially complete in that a Reuse Plan has been prepared and adopted as the Redevelopment Plan for Hamilton.

The DODHF Novato Disposal and Reuse EIS integrates the baseline for analysis with the community reuse planning and environmental review process that was undertaken by the City of Novato and the U.S. Navy. It is the intent of the Agency and the City to utilize the same baseline for analysis such that the previously prepared EIS may be used, as expressly permitted by the CEQA statute, as an EIR for the disposal and reuse of the Navy-owned properties at Hamilton.

***BASELINE PROVISIONS***

The following addresses and complies with the requirements identified in §15229(a)(3)(B) of the State CEQA Guidelines:

As the federal EIS prepared for the Disposal and Reuse of the Navy-owned properties at Hamilton fully meets the requirements of CEQA, it is not the Agency's intent to duplicate prior environmental analysis, but rather to utilize the EIS and information in the EIS as all or part of the Draft EIR thus avoiding duplication, as permitted by §15225 of the State CEQA Guidelines. City and Agency staff have identified four environmental issues (as noted above) that require further environmental evaluation in this Draft EIR. In order to ensure the analysis and findings of significance are consistent between documents, the Agency proposes to use the same baseline provisions as identified in the EIS. Therefore, this Draft EIR analyzes air quality, transportation/circulation, hazards materials and noise based on the land uses adopted in the Reuse Plan and subject to the implementation framework identified in the Redevelopment Plan. The analysis integrates the reuse planning process, taking into account that the Reuse Plan has been integrated into and found to be consistent with the Novato General Plan and all other applicable local and regional plans and policies.

The following addresses and complies with the requirements identified in §15229(a)(3)(C) of the State CEQA Guidelines:

The Redevelopment Agency has used the baseline physical conditions for the following reasons: the baseline accurately reflects existing conditions at the time of the DODHF closure in 1995 and, as such, these conditions are also reflected in the existing conditions (baseline) assumptions of the 1996 Novato General Plan. The General Plan used this baseline as a component of its development strategy. Therefore, the use of the EIS baseline for the EIR analysis provides consistent baseline information and thus continuity between the EIS, the General Plan and the Reuse Plan. This consistency validates the local and regional planning process that has already occurred which has identified a long-range vision for Novato and the Department of Defense Housing Facility that promotes economic continuity through the reuse of community resources such as those provided by reusable land uses and infrastructure, environmental opportunities, low and moderate income housing, and community identity. The General Plan envisions a better quality of life for all of its residents by limiting waste, preventing pollution, maximizing conservation, promoting efficiency, and developing renewable resources to drive the local economy through the creation of jobs and opportunities for skilled workers as identified in the EIS baseline and the revised Reuse Plan Alternative - Preferred Alternative. Thus, the Agency has concluded that the use of the EIS baseline, integrated as it has been in the local planning process, is critical to the continued long-range vision of Novato and the economic continuity it seeks to build upon.

## 2.5 DOCUMENTATION INCORPORATED BY REFERENCE

Pertinent documents relating to this Draft EIR have been cited in accordance with §15148 of the State CEQA Guidelines. Section 15150 of the CEQA Guidelines encourages “incorporation by reference” as a means of reducing redundancy and length of environmental reports. The following document, which is available for public review at the City of Novato, 901 Sherman Avenue, Novato, California, is hereby incorporated by reference into this Draft EIR. Information contained within this document has been utilized for each section of this Draft EIR.

- ‘ *Final Environmental Impact Statement for the Disposal and Reuse of the Department of Defense Housing Facility, Novato, California*, U.S. Navy Engineering Field West, November 1997. Record of Decision filed June 1998.

The Disposal and Reuse EIS is summarized below.

### Summary of the Hamilton Disposal and Reuse EIS

Pursuant to the Defense Base Closure and Realignment Act (Public Law 101-510) and the base closure decisions approved by Congress in 1993, the Department of Defense Housing Facility Novato (DODHF Novato) in Novato, California, was closed in September 1996. DODHF Novato includes two Navy-owned areas at the former Hamilton Air Force Base—the Mainside property and the off-site Rafael Village housing property. The Environmental Impact Statement (EIS) analyzes the potential significant environmental consequences from the proposed Navy disposal of federal surplus property and structures and community reuse of DODHF Novato property, and has been prepared in accordance with the National Environmental Policy Act.

The Preferred Alternative evaluated in the EIS is the disposal of federal surplus property and structures by the Navy and subsequent reuse as described by the Hamilton Army Airfield Reuse Plan (“Reuse Plan”) of October 1995, as amended and approved in February 1996 by the City of Novato, and incorporating technical updates published in November 1996. The revised Reuse Plan (November 1996) proposes demolishing existing housing and constructing new housing units at Rafael Village and reusing existing Mainside buildings and structures for uses similar to historic uses. An Open Space Alternative and the required No Action Alternative are also evaluated. For purposes of the Navy NEPA analysis, direct environmental consequences or impacts are those associated with Navy disposal of surplus property and the No-Action Alternative. Indirect impacts are those associated with community reuse of Navy surplus property. The Navy’s roles and responsibilities for disclosing indirect reuse-related environmental impacts is to address reasonably foreseeable impacts. However, property reuse will occur after it is conveyed from federal ownership and in support of local reuse actions. Implementation of mitigation measures for reuse environmental impacts is a local

responsibility and not the responsibility of the Navy unless specifically identified in the Final EIS and the Record of Decision.

The EIS includes analysis of potential direct environmental impacts from disposal and the No Action Alternative and indirect environmental impacts from community reuse related to land use, aesthetics and scenic resources, socioeconomics, public services, utilities, cultural resources, biological resources, geology and soils, water resources, traffic and circulation, air quality, noise and hazardous materials and waste. For each resource area evaluated in the EIS, impacts of disposal and of each alternative reuse action, including the No Action Alternative, are projected to 2010. (Due to the availability of regional projection data, traffic impacts are projected to 2015 and socioeconomic impacts are projected to 2020).

The only significant and unmitigable impact identified was due to the continued exposure of existing housing areas to existing noise levels above 60 decibels under each of the reuse alternatives. No significant environmental impacts would result from disposal or from the No Action Alternative. As noted in Section 1.3 of this EIR, potentially significant and mitigable environmental impacts from reuse would occur to biological resources, geology and soils, water resources, traffic and circulation, and air quality and from generation of waste from demolition and construction activities. Implementation of the mitigation measures identified in the EIS (see Section 2.7 and Appendix C of this EIR) would reduce these environmental impacts to not significant or acceptable levels for all impacts except noise. Remediation of contaminated areas will continue to be the responsibility of the Navy.

A brief summary of the environmental effects evaluated in the Disposal and Reuse EIS is provided below. The Disposal and Reuse EIS Executive Summary is provided in Appendix A, as an attachment to the NOP.

### **Land Use**

The disposal of DODHF Novato would not result in any land use impacts. The reuse of DODHF Novato would not result in any significant land use impacts. Demolition and construction activities at the Rafael Village, Commissary Triangle, and Exchange Triangle planning areas would have temporary effects on surrounding residential areas. These would be of short duration and not significant. Reuse of the Commissary Triangle and Exchange Triangle planning areas as detailed under the reuse alternatives would be compatible with surrounding land uses. The Reuse Plan specifies land use policies 3.6.2.5.1 through 3.6.2.5.7 as measures to achieve compatible land use with Lanham Village and other adjacent uses. No impacts would result from reuse of the other planning areas as the type of land use would not change.

### **Aesthetics and Scenic Resources**

Disposal of DODHF Novato would have no impact on aesthetic and scenic resources. Reuse of DODHF Novato would have no significant impact on aesthetic and scenic resources. Construction and demolition activities could have short-term visual effects but these would not be significant. Reuse of Rafael Village for new residential housing (revised Reuse Plan Alternative) or as open space (Open Space Alternative) would have a beneficial visual effect.

### **Socioeconomics**

Disposal of DODHF Novato would have no impacts on socioeconomic factors. Reuse of DODHF Novato would have a beneficial effect on the regional economy and recreational opportunities. Reuse would not significantly affect population, housing, or schools in the region. Reuse would have a beneficial effect on the homeless and low-income population of the area through the creation of affordable housing and transitional/emergency shelter housing.

### **Public Services**

Disposal of DODHF Novato would have no impacts on police, fire, or emergency medical services in the Novato area. Reuse of DODHF Novato would have no significant impacts on police, fire, or emergency medical services in the Novato area. Any increase in service needed as a result of reuse would be funded with taxes generated by the new development.

### **Utilities**

Disposal of DODHF Novato would have no impacts on utilities including electric, natural gas, telephone, water, and sanitary sewer capacity. Reuse of DODHF Novato would have no significant impacts on electric, natural gas, telephone, and water utilities, and water supply, sanitary sewer capacity, or landfill life. A significant and mitigable impact would result if demolition of Rafael Village structures prevented Marin County from meeting the Cal EPA solid waste reduction standards of 50 percent by 2000. The California Integrated Waste Management Board has been exploring ways to assist localities to divert construction and demolition debris from landfills through reuse, recycling, and other strategies.

### **Cultural Resources**

No significant effects to National Register of Historic Places-eligible resources would occur from Navy disposal of DODHF Novato because historic properties would be transferred through National Park Service conveyances that assure preservation of historic property. No significant impacts to historic resources would result from community reuse because reuse of these properties would be restricted through the conditions of the public benefit conveyances in a manner that assures the continued preservation of these resources. No significant impacts to subsurface prehistoric and historic archaeological resources or noncontributing structures would occur under reuse.

### **Biological Resources**

No impacts to biological resources would result from disposal of DODHF Novato. Increased erosion could result in a significant and mitigable indirect impact to sensitive wetland and riparian habitats in San Jose Creek adjacent to the southern boundary of Rafael Village and other wetland habitats. These impacts could be reduced to less than significant levels by implementing standard erosion control measures. No significant impacts are expected to nonsensitive species or habitats from the reuse of DODHF Novato. No significant impacts would result in the upland sensitive habitats (valley oak woodland and California bay forest) since reuse activities would not occur within these areas and the existing uses of these areas would not change.

### **Geology and Soils**

Disposal of DODHF Novato would have no impact on geology and soils. A potentially significant and

mitigable impact could occur if demolition and new construction in Rafael Village undermines or weakens unstable slopes. A significant and mitigable impact could result if existing and proposed improvements in certain Mainside areas, particularly those on reclaimed land underlain by imported fill and bay mud, were exposed to potentially damaging levels of ground shaking during a large earthquake centered on one of the three nearest active faults. These impacts would be mitigable by identifying geologic hazards through geotechnical studies and performing seismic studies on existing structures to determine necessary upgrades.

### **Water Resources**

Disposal of DODHF Novato would have no impact on water resources. Significant and mitigable impacts could result from grading, demolition, and construction of new Rafael Village area houses by disturbing the soil and increasing erosion/sedimentation into San Jose Creek, affecting surface water quality. Significant and mitigable impacts also could result from grading, demolition, and construction of new buildings in any of the Mainside planning areas from soil disturbance and increased erosion/sedimentation into Pacheco Creek and downstream in Ignacio Reservoir, Novato Creek, and San Pablo Bay. These impacts could be mitigated to not significant levels through implementation of standard erosion control measures.

Significant and mitigable impacts could result if new Rafael Village area houses are developed in mapped 100-year floods from San Jose Creek, subjecting those houses to potential flood hazards. This impact could be mitigated by restricting development to outside of the flood plain boundaries. Significant and mitigable impacts could result if development and reuse of Commissary Triangle and the Exchange Triangle subjected residents, workers, and other occupants of those areas to flood hazards in the event of a 100-year flood on Pacheco Creek. This impact would be mitigated by limiting reuse of these areas until after completion of the planned new levees west of the airfield or raising the base level of developed areas of the site to a minimum of 10 feet (mean sea level).

Significant and mitigable impacts could result from the existing Rafael Village storm drain system, which was designed to handle a 10-year recurrence interval rainfall, being inconsistent with the City of Novato's 25-year recurrence interval standard. To mitigate this impact the city should require upgrade of system upon redevelopment of Rafael Village. Significant and mitigable flood hazard impacts also could occur if constrictions in the drainage facilities downstream of Main Gate Road resulted in flooding of the Exchange Triangle area and adjacent lands along Pacheco Creek immediately upstream of that area during 100-year storm events. To mitigate this impact, the deficient drainage facilities should be replaced and expanded as necessary to convey 100-year flood flows concurrent with the redevelopment of the Exchange Triangle area.

### **Traffic and Circulation**

Disposal of DODHF Novato would have no impact on traffic and circulation. Reuse of DODHF Novato would have no significant impacts on local intersection operations or regional freeways. A significant and mitigable impact would result from the increase in demand for transit services from reuse of DODHF Novato under the reuse alternatives. This impact could be mitigated by constructing or improving internal roadways to accommodate transit vehicles or by providing a shuttle service. Reuse of DODHF Novato would contribute cumulatively to the regional traffic conditions, but to a less significant degree than under the City of Novato Preferred General Plan. This is because the reuse alternatives would generate fewer vehicle trips than projected vehicle trips for DODHF Novato under the Preferred General Plan.

### **Air Quality**

Disposal of DODHF Novato would not result in any air quality impacts. Property disposal actions generally qualify as de minimis actions under EPA's Clean Air Act conformity determination rule. A significant and mitigable impact could result from building demolition, renovation, and construction activities generating localized dust nuisance conditions. Implementation of dust control measures would reduce potential impacts to a not significant level. No significant air quality impacts would result from traffic-related ozone precursor emissions or carbon monoxide.

### **Noise**

Disposal of DODHF Novato would not result in any noise impacts. Significant and mitigable noise impacts from building demolition, renovation, and construction activities associated with reuse of the Rafael Village, Commissary Triangle, and Exchange Triangle planning areas would occur from causing temporary noise disturbances to adjacent land uses. Limiting the use of heavy construction equipment and outdoor power tools to normal daytime hours would reduce potential noise impacts to a less than significant level. A significant unmitigable noise impact would result from residential reuse in areas that would be exposed to existing ambient noise levels significant above the land use compatibility guidelines provided in the Novato General Plan. While not completely mitigable, the City of Novato and California Department of Transportation should evaluate the feasibility of additional sound walls along US 101 in order to reduce traffic noise impacts on adjacent properties. During detailed planning for new housing units in Rafael Village, the City of Novato should consider site designs that provide for sound walls along Ignacio Boulevard. No significant impacts to surrounding land uses would result from on-site traffic resulting from reuse.

### **Hazardous Materials and Waste**

Disposal of DODHF Novato would not result in any hazardous materials or waste-related impacts. Reuse of DODHF Novato would not result in any significant hazardous materials or waste-related impacts. Hazardous materials used and waste generated under the reuse alternatives would be regulated by existing state and federal regulations. Remediation of contaminated areas will continue to be the responsibility of the Navy, subject to applicable federal and state regulations.

### **OTHER CONSIDERATIONS REQUIRED BY NEPA**

Chapter 5 discusses other topics required by NEPA; these include an analysis of cumulative impacts, identification of growth-inducing impacts, unavoidable adverse effects, and irreversible or irretrievable commitment of resources, the relationship between short-term uses and long-term productivity, identification of any unavoidable adverse impacts from the alternatives, and environmental justice. These topics are summarized below.

#### **Cumulative Impacts**

The reuse alternatives, in conjunction with other major military and nonmilitary projects in the region, would result in cumulative impacts to several resources. Some of these impacts, such as land use and socioeconomics, would be beneficial. Other impacts would be fully or potentially offset through the planning process or specific mitigation measures. Potentially significant unmitigable cumulative impacts have been identified for traffic and circulation.

#### **Growth-inducing Impacts**

The reuse alternatives would not be projected to cause significant adverse growth-inducing impacts.

### **Unavoidable Adverse Effects**

The revised Reuse Plan Alternative and the Open Space Alternative would result in unavoidable adverse impacts by exposing new residents of the Capehart/Hillside Housing and Rafael Village areas to noise levels above land use compatibility guidelines outlined in the Novato General Plan. The Open Space Alternative would similarly expose residents of Capehart/Hillside Housing to noise levels above guidelines.

### **Short-term Uses and Long-term Productivity**

The productivity of DODHF Novato historically has been related to its operation as a military housing support facility, and the resulting military jobs and services it has provided. The reuse alternatives would make use of properties that would otherwise be left unused, improving both the short-term and long-term economic productivity of the City of Novato and Marin County over conditions that would occur with a closed, inactive facility. Additional long-term benefits include environmental cleanup of contaminated sites, provision of jobs, housing, and recreational opportunities, maintenance of open space, and maintenance of various infrastructures on the site.

### **Irreversible/Irretrievable Commitment of Resources**

None of the alternatives would require significant commitments of energy and resources.

### **Environmental Justice**

None of the alternatives would have a disproportionately high and adverse effect on minority or low-income communities.

## **2.6 OTHER RELATED REFERENCES**

The following documents describe aspects of the Project Area and/or actions related to the proposed CEQA Project, and were therefore integral to the preparation of this EIR. Additional references are noted in Section 12 of this EIR.

- ' *Redevelopment Plan for the Hamilton Field Redevelopment Project*, Redevelopment Agency of the City of Novato, Adopted July 14, 1998 (Ordinance No. 1394) and amended November 24, 1998 (Ordinance No. 1401).
  
- ' *Draft Phase IV Finding of Suitability to Transfer Prior to Completion of Petroleum Related Corrective Action, Department of Defense Housing Facility, Novato, California*, Department of the Navy, Engineering Field Activity West, August 1998.
  
- ' *Hamilton Reuse Plan General Plan Conformance Findings, Planning Commission Staff Report*.

August 10, 1998.

- ' *Hamilton Army Airfield Reuse Plan*, Hamilton Local Reuse Authority, Adopted October 1995, Revised November 1996.
- ' *Approved Initial Study/Environmental Checklist and Negative Declaration, Hamilton Army Air Field Purchase and Sale Agreement, Acquisition, Master Developer Agreement and Selection of a Master Developer: Navy Property*, Robert Bein, William Frost & Associates, May 14, 1996.
- ' *Hamilton Field Project Final Subsequent Environmental Impact Report Addendum No. 1*, Robert Bein, William Frost & Associates, December 28, 1994.
- ' *Hamilton Master Plan*, New Hamilton Partnership, prepared by Gates & Associates, October 15, 1993, revised May 1994.
- ' *Hamilton Field Project Final Subsequent Environmental Impact Report*, EIP Associates, March 1993.
- ' *Hamilton Central Design Concepts and Design Guidelines*, New Hamilton Partnership, prepared by Gates & Associates, February 2, 1994, revised April 19, 1994, revised May 1994.
- ' *Final Phase 1 Supplemental Environmental Baseline Survey Department of Defense Housing Facility Novato, California*, Department of the Navy, Engineering Field Activity West, April 21, 1997.
- ' *Basewide Environmental Baseline Survey/Community Environmental Response Facility Act Report for DODHF-NOVATO Contract N62474-92-D-3607*, Engineering Field Activity West, Naval Facilities Engineering Command, prepared by ERM-West Inc, October 19, 1995.
- ' *Hamilton Field Project Addendum to the Final Subsequent Environmental Impact Report*, City of Novato, prepared by EIP Associates, May 1993.
- ' *Hamilton Wetland Restoration Plan EIR/EIS*, Jones & Stokes Associates, Inc., August 4, 1998.
- ' *Hamilton Service Center Relocation EA/FONSI and MND*, Robert Bein, William Frost & Associates, approved September 1996.



## **2.7 ADOPTION OF EIS MITIGATION MEASURES**

The Redevelopment Agency is responsible for implementing each of the mitigation measures identified in the DODHF Novato Disposal and Reuse EIS. All of the mitigation measures would be adopted by the Redevelopment Agency with Project implementation. As stated in the Disposal Record of Decision (ROD) filed in June 1998, the Navy has no responsibility for mitigation implementation. However, the Navy is responsible for soils remediation of any lead based paint at the Capehart/Hillside areas.

In addition, a Mitigation Monitoring Program (MMP), will be prepared that identifies the timing, responsible parties and monitoring agencies for each of the mitigation measures included in the DODHF Novato Disposal and Reuse EIS as well as the additional mitigation measures included in this Draft EIR.

The following is the list of mitigation measures applicable to the implementation of the Reuse Plan (pursuant to the Redevelopment Plan) that are included in the DODHF Novato Disposal and Reuse EIS. Mitigation Measures are identified by the EIS section title. A complete list of all Project mitigation measures, including those developed and identified in the Disposal and Reuse EIS and those identified in this Draft EIR, is included as Appendix C to this Draft EIR.

### **Utilities - Solid Waste Management**

1. The California Integrated Waste Management Board (CIWMB) has been exploring ways to assist localities to divert construction and demolition debris from landfills through reuse, recycling, and other strategies. An informal base closure team has been organized with CIWMB staff and others to examine the issues and identify Projects that could assist counties involved in base closures.

CIWMB has asked the Trade and Commerce Agency for funds to do several Projects. The following are those proposed activities applicable to the demolition issue:

- ' Researching and producing guidebooks on suggested demolition practices to be used to minimize contamination and to maximize reuse;
- ' Developing a local materials exchange program adopted to base closures;
- ' Identifying reuse opportunities, processors and markets for recovered materials;
- ' Developing local ordinances that require construction and demolition efforts to follow recovery and recycling guidelines; and
- ' Developing guidelines for handling potentially hazardous materials included in construction and demolition debris.

Taking the lead in addressing recycling associated with military base closures, the Secondary Materials and Technology Branch has been conferring with the Trade and Commerce Agency about

the need for funding to support the CIWMB's base closure program. The CIWMB has requested funds from Trade and Commerce to implement technical assistance activities directed toward communities impacted by base closure. The CIWMB has no direct funding for diversion efforts by affected jurisdictions.

The California Pollution Control Financing Agency does not provide direct funding to the public sector but to private sector operators and developers of waste management infrastructure. Waste disposal and resource recovery businesses would be eligible to apply for this financing, which is backed by tax-exempt bonds issued by the state.

### **Biological Resources**

1. Implementation of standard erosion control measures to minimize sedimentation into creeks and other wetlands during new construction as described in Section 4.9.2 of the Disposal and Reuse EIS, Water Resources, would prevent significant impacts to sensitive species and habitats. Protect off-site areas (including streams and riparian areas) from potential erosion from adjacent bared areas by use of silt fences, staked straw bales, sedimentation basins, and other appropriate structural methods.

### **Geology and Soils**

1. Prior to approval of detailed demolition and construction plans, site-specific geotechnical investigations would be conducted to identify potential geologic hazards that may affect new building sites. Geotechnical investigations are currently required in compliance with the City of Novato General Plan (Health and Safety Policy 16, HS-8) in areas showing landslide potential. Two such areas have been identified adjacent to Rafael Village. This policy should be extended to other areas at DODHF Novato covering or creating slopes in excess of 15 percent. A geotechnical engineer should review design plans and details and other improvement plans to determine whether they are compatible with the geotechnical conditions of the site. A geotechnical engineer and engineering geologist would inspect the site grading and document placement of engineered fills, stability of cut and fill slopes, and placement of subdrains. Application of site-specific recommendations of a geotechnical engineer and engineering geologist would reduce this potentially significant impact to a not significant level.
2.
  - a. An evaluation of the ability of existing structures to withstand site-specific seismic forces should be performed to identify structures that should be upgraded to reduce the potential for injury, loss of life, or economic damage. The evaluation should target all buildings intended for public occupancy, as well as other structures representative of the range of building types. The cost of upgrading the structures to meet existing building codes should be compared with the cost of replacement, and upgrade or replacement should be made a prerequisite of occupancy.
  - b. Roads and utilities should be evaluated to determine if upgrades are needed to reduce safety hazards and to maintain emergency services after a strong earthquake.
  - c. All new construction would be designed to meet applicable building codes. A geotechnical engineer should review design plans and details and other improvement plans to determine

whether they are compatible with the geotechnical conditions of the site.

- d. Zoning to limit construction in areas subject to strong ground motion should be considered by the City of Novato. Implementation of the recommendations of site-specific evaluations and applicable building codes would reduce this potential impact to a not significant level.

### **Water Resources**

1. Develop erosion control plans consistent with the Storm Water Pollution Prevention Plan (SWPPP) prior to any site clearing or grading. Protect off-site areas (including streams and riparian areas) from potential erosion from adjacent bared areas by use of silt fences, staked straw bales, sedimentation basins, and other appropriate structural methods. Where necessary, erosion control structures should be in place prior to the start of the rainy season (October 15) and should remain in place through the end of that season (April 15). The SWPPP should include a Best Management Practices (BMP) program for stormwater collection as part of the reuse Project. The BMP program should focus on the following:
  - ' Containing and controlling land use activities to prevent the generation of pollutants that might affect water quality;
  - ' Preventing and controlling stormwater runoff; and
  - ' Retaining and treating runoff on-site before it infiltrates the ground water or is released into the bay.

Where appropriate, nonstructural BMPs should be given preference over structural BMPs. The BMP program should use management measures and practices identified by the EPA in the Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters and the California Storm Water Best Management Practice Handbook. The BMP program should be consistent with the requirements of the State Water Resources Control Board and the Regional Water Quality Control Board (RWQCB).

2. Limit development of new houses to outside the mapped 100-year flood plain of San Jose Creek.
3. During redevelopment of Rafael Village, the City of Novato shall require upgrading of all Project area storm drains to meet the current City standard of a 25-year recurrence interval rainfall.
4. Develop erosion control plans consistent with the Storm Water Pollution Prevention Plan (SWPPP) prior to any site clearing or grading. Protect off-site areas (including streams and riparian areas) from potential erosion from adjacent bared areas by use of silt fences, staked strawbales, sedimentation basins, and other appropriate structural methods. Where necessary, erosion control structures should be in place prior to the start of the rainy season (October 15) and should remain in place through the end of that season (April 15). The SWPPP should include a Best Management Practices (BMP) program for stormwater collection as part of the reuse Project. The BMP program should focus on the following:
  - ' Containing and controlling land use activities to prevent the generation of pollutants that might affect water quality;

- ' Preventing and controlling stormwater runoff; and
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5.
  - a. Reuse of planning areas subject to 100-year flood hazards shall not occur until after completion of the planned new levees west of the airfield. Development should be set back from those levees a sufficient distance, as determined by the City of Novato, to allow for levee maintenance and raising as required to account for projected rise in sea level and settlement of underlying muds.
  - b. As an alternative to levee protection, any new development at sites below 10 feet mean sea level (msl) should be protected from flooding by raising the base level of developed areas of the site to a minimum of 10 feet msl. This elevation may be revised as appropriate, based on the refinements of estimates of the effects of sea level rise in combination with storm surges. In addition, any new development should comply fully with the City's Flood Damage Protection ordinance. All 100-year floodplains on the site should be incorporated into the City's flood hazard zoning maps.
  - c. As identified in the New Hamilton Partnership (NHP) Project EIR, the levee shall be fitted with redundant pumping systems and an emergency power supply to assure that adjacent low-lying areas are not flooded in the 100-year storm in the event of a power interruption or pump failure. The Ballfields area is part of the emergency retention area for backed up storm water in the vent of a pump failure. This area should remain in open space or undeveloped recreational use to assure adequate emergency flood storage area.
6. The deficient drainage facilities downstream from the Exchange Triangle and Main Gate Road should be replaced and expanded as necessary to convey 100-year flood flows concurrent with the redevelopment of the Exchange Triangle area. Specific required drainage improvements should be determined by the City Public Works Department.

### **Traffic and Circulation**

1. Internal collector roadways (Randolph Drive, Bolling Drive, and Escolta Avenue) at the Mainside could be constructed or improved to accommodate transit vehicles. In addition, a service could be provided to shuttle people from on-site locations to bus stops on Nave Drive. The most cost-effective means of providing this shuttle is likely to be an expansion of the New Hamilton Partnership (NHP) shuttle service.

**Air Quality**

1. Implementation of the following dust control practices during demolition, construction, and renovation activities would reduce potential impacts to a not significant level.
  - ' Minimize the area disturbed by clearing, earthmoving, or excavation activities.
  - ' Prevent excessive dust generation by using water or dust control solutions on all unpaved areas subject to vehicle traffic, grading, or excavation.
  - ' Ensure that any petroleum-based dust control products used on the site meet BAAQMD regulations for cutback asphalt paving materials.
  - ' Halt all site clearing, grading, earthmoving, and excavation activities during periods of sustained strong winds (hourly average wind speeds of 20 mph or greater).
  - ' Sweep streets adjacent to the construction site as necessary to remove accumulated dust and soil.
  - ' Properly maintain all construction vehicles and avoid excessive idling of inactive equipment.

**Noise**

1. Limit the use of heavy construction equipment and outdoor power tools to normal daytime hours (7 AM through 7 PM) during construction and demolition activities. Limiting construction and demolition activities to normal daytime hours would reduce potential noise impacts to a less than significant level.
2. The City of Novato and Caltrans should evaluate the feasibility of additional sound walls along U.S. 101 in order to reduce traffic noise impacts on adjacent properties. During detailed planning for new housing units in Rafael Village, the City of Novato should consider site designs that provide for sound walls along Ignacio Boulevard. Although sound walls would reduce ambient noise levels by approximately 5 dB, the noise levels would still be significant in those areas nearest U.S. 101 and Ignacio Boulevard.