3 EXECUTIVE SUMMARY

3.1 INTRODUCTION

This Revised Draft Environmental Impact Report (EIR) evaluates the potential environmental impacts that may be associated with the implementation of the Central Larkspur Specific Plan (Specific Plan) by the City of Larkspur (City). The Revised Draft EIR is intended to "identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided" (California Environmental Quality Act (CEQA), Public Resources Code [CEQA] 21002.1(a)).

An EIR is meant to provide an objective, impartial source of information to be used by the lead agency and members of the public in their considerations of the project. The EIR itself does not determine whether or not the project will be approved, but only serves as an informational document in the local planning and decision-making process.

This document has been prepared as a "program" EIR, rather than as a more detailed "project" EIR. The Specific Plan does not propose any individual projects, but instead provides a framework for future development within the Specific Plan area. Because of the Specific Plan's general (rather than project-specific) focus, the use of a "program" EIR is appropriate in reviewing the environmental impacts that may be associated with implementation of the Specific Plan. Although the Specific Plan establishes density ranges for future development, setback requirements, and dedication and/or fee requirements, site-specific details of future development projects are largely unknown at the present time. For this reason, this evaluation of the environmental impacts that may be associated with implementation of the Specific Plan is necessarily more general than one would expect in an EIR that focuses on a specific development projects. Individual development projects that are proposed will require additional, site-specific environmental review beyond that provided in this document.

3.2 SITE LOCATION AND DESCRIPTION

The Specific Plan area is located in central Larkspur (Exhibit 2-1 in Section 2, Project Description); portions of the Specific Plan area lie within, adjacent to, and northeast of downtown Larkspur (Exhibit 2-2). The Specific Plan encompasses a 22-acre rectangular-shaped area of relatively flat land that is bordered by Magnolia Avenue on the west; East Ward Street, Meadowood Drive, and Larkspur Creek on the south; Larkspur Creek on the east; and Doherty Drive on the north. The entire Doherty Drive right-of-way, from Magnolia Avenue east to the city limit (5.58 acres), is also included in the Specific Plan area. Doherty Drive is bordered by Mt. Tamalpais Racquet Club, Hall Middle School, Piper Park, and residential development on the north, and by Redwood High School, Tamalpais High School District facilities on the south, and the rest of the Specific Plan area.

3.3 PURPOSE OF AND NEED FOR THE PROJECT

Under California law (Government Code §65450 et seq.), a city or county may use the mechanism of a specific plan to enact specific regulations, programs, and legislation to help achieve goals expressed in its adopted General Plan. The draft Specific Plan was prepared to facilitate the development of the approximately 16.8 acres formerly used for the Niven wholesale nursery operation and additional underdeveloped area to the west of the Niven property. The Specific Plan is based on a firm policy position established in the Larkspur General Plan and the Downtown Larkspur Specific Plan. The Central Larkspur Specific Plan has six proposed goals that define the plan's overall purpose and provide general direction for formulating policies and objectives:

- **Goal 1: Land Use.** Develop the Specific Plan area as an integrated and cohesive mixed-use neighborhood that provides a focal point and activity center for Downtown and serves as a transition to the surrounding community. The majority of the land area will be in low-density residential use compatible with the surrounding community. Provide sufficient open space to preserve and enhance environmental resources and serve as a community amenity.

- **Goal 2: Transportation.** Create a pedestrian friendly environment, minimize traffic impacts, and promote alternative modes of transportation by balancing the density, intensity, and mix of land uses. Provide a system of traffic improvements, safe, direct, and attractive bicycle and pedestrian routes, and adequate parking.

- **Goal 3: Housing.** Develop the area as a predominantly low-density residential neighborhood emphasizing a range and diversity of housing types, perceived scales and density. Encourage a range of housing affordability, including housing affordable to low- and moderate-income households and senior citizens.

- **Goal 4: Community Design.** Design the area and individual buildings to complement and respect Larkspur's small town character and our historic Downtown. The scale and design of residential development should be similar to that in the Heather Gardens, Monte Vista, and the Baltimore Park neighborhoods. The design should emphasize a variety of building sizes, scales and architecture. The design should be pedestrian friendly, and have a strong landscape character. The design should integrate the three subareas of the Specific Plan area.

- **Goal 5: Utilities.** Provide for the distribution, location, extent, and intensity of adequate public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities to support the land uses described in the Specific Plan. Private development shall pay for utility improvements required to service new growth.

- **Goal 6: Planning.** Provide a clear plan for implementing the community's goals for the Central Larkspur Specific Plan area. The implementation plan shall include

regulations, programs, public works projects, and financing measures to achieve the distribution and location of land uses, including open space, described in the Specific Plan. The Specific Plan will also provide implementation measures for the housing, transportation, community design, and utility goals of the plan.

3.4 PROJECT OVERVIEW AND COMPONENTS

The Specific Plan proposes a mixed-use development area with retail, recreation, cultural, civic, and residential uses that would contribute to the vitality of the Downtown area, combining current land uses with new development. Subarea 1 consists of five properties fronting on Magnolia Avenue and East Ward Street in the southwest portion of the Specific Plan area, encompassing the historic railroad structures and adjacent commercial buildings, a City park, an access driveway to Larkspur Plaza, a City-owned parking lot, and the American Legion hall. Subarea 2, which fronts on Doherty Drive near Magnolia Avenue, has existing commercial establishments including Albertsons supermarket and a gas station. Subarea 3 consists of the Niven property. The Doherty Drive right-of-way is included within the Specific Plan boundaries but is not developable for any other use and thus is not included within the development subareas Other planning and site improvements would be required and are described below. A number of land uses are permitted in each of the subareas, as described in the Specific Plan and regulated by the City Zoning and Subdivision Ordinance. These land uses are summarized below.

SUBAREA 1

Principal permitted land uses in Subarea 1 include multifamily residential, retail sales, business and personal services, hotel/inn, office, cultural/civic, and public parking. Total development intensity, exclusive of parking, would not be permitted to exceed a floor area ratio (FAR) of 0.6 (for a maximum of 28 residential units); however, the Specific Plan offers additional development capacity (FAR of 0.8) as an incentive to encourage development of a hotel/inn in Subarea 1. Building coverage would not exceed 40% of the site area.

Doherty Park would remain in its current condition and the American Legion hall would be retained. The two one-story commercial buildings on the Nazari property would be permitted to be demolished to accommodate construction of new buildings and facilities. The former railroad station and warming house would remain in their present location, and provisions would be made to protect their historic value. Open space, sized and designed to accommodate community-oriented activities, would be provided adjacent to the two preserved railroad buildings to provide an appropriate setting for these historic structures. A new bikeway and footpath alignment would be added to connect the bikeway segment on the former Northwestern Pacific Railroad right-of-way with the existing bikeway along Magnolia Avenue via Larkspur Plaza. The existing access driveway to Larkspur Plaza from Magnolia Avenue would remain, but the driveway entrance would be narrowed. The City parking lot at East Ward Street and Magnolia Avenue would remain, or would be improved.

SUBAREA 2

Permitted uses in Subarea 2 would include retail sales, business and personal services, office, and residential. A FAR of 0.4 would be allowed in this area. An additional 4,500 square feet of retail or personal services space could be added to the west side of the Albertsons building if the supermarket's loading dock were removed. Additional floor area, not to exceed a FAR of 0.2, would be conditionally permitted for residential space meeting the City's definition of affordable housing. A maximum of 19 multifamily residential units would be permitted. Office space is limited to 20% of the total floor area. The continued operation of the service station would be encouraged.

SUBAREA 3

Permitted land uses would be limited to residential, community facilities for the residents, and public-serving parking, as well as a public park. Between 25 and 35 single-family homes would be constructed; a minimum of 25% of the units would have a floor area of 3,000 square feet or less. Between 23 and 33 cottage homes ranging from 850 to 1,980 square feet would be constructed. Dedication of approximately 0.9 acre would be required to satisfy the General Plan park designation and the City's Park and Recreation Land and Fees Ordinance.

A 1.2- to 1.5-acre site would be made available for purchase for the purpose of construction of up to 27 units of low- and moderate-income housing (limited to very low-, low-, and moderate-income tenants). Between 40% and 50% of these units would be restricted to households in which one or more of the residents is 62 years of age or older. Priority for eligibility would be given to households with one or more persons employed within a 5-mile radius. If the multifamily housing site were developed as affordable housing, up to 85 residential units may be developed in Subarea 3. If not, then up to 70 units (10%, or seven, of them affordable units) may be built.

An open-space buffer would be provided along Larkspur Creek. The buffer would be at least 50 feet wide from the top of bank on the north/south reach of the creek, and at least 25 feet wide from the top of the bank on the east/west reach. No building and no impervious surface (except bikeways and footpaths) would be located within the open-space buffer. A public park would be provided and community-service space may be built, primarily for the use of residents of Subarea 3.

Aside from the requirements stated in the goals, policies, and standards of the Specific Plan, other actions would be required before development may occur within Subarea 3, include the following:

- Removal Action Workplan (RAW) for contaminated soils (lead, arsenic, DDT) in Subarea 3 (ENSR, International 2002)

- Soil surcharge in Subarea 3 to precompress the underlying Bay Mud, engineered fill for upper three feet of existing fill materials in Subarea 3, and treatment of corrosive soils in Subarea 3 (Harza Engineering Company 1998a) (Appendix C-1)

3.5 PROJECT BACKGROUND

The *Draft Central Larkspur Specific Plan* (2001 Draft Specific Plan) (City of Larkspur 2001) was prepared by Thomas Cooke Associates for the City in June 2001 in order to facilitate the redevelopment of 22 acres adjacent to downtown Larkspur. The *Draft Central Larkspur Specific Plan Draft Environmental Impact Report* (previous Draft EIR) (City of Larkspur 2002) was subsequently prepared by Lamphier-Gregory for the City in conformance with CEQA §21000 et seq., as amended, and the State CEQA Guidelines §15000 et seq., and was based on the project description, goals, and policies described in the 2001 Draft Specific Plan.

In June 2002, the previous Draft EIR was circulated for a 45-day review period. A number of substantive comments were received; based on this input, it was determined that the 2001 Draft Specific Plan and the previous Draft EIR would be revised and updated as appropriate and recirculated pursuant to Guidelines §15088.5(f)(1).

The City has revised the previous Draft EIR to reflect the revised Specific Plan and recirculated this Revised Draft EIR under Guidelines §15087 because significant new information was added to the EIR after public notice was given of the availability of the previous Draft EIR for public review but before the document was certified.

In accordance with the Guidelines, a Notice of Preparation (NOP) of the revised Draft EIR was distributed on April 2, 2003, to public agencies and organizations, as well as to private organizations and individuals with a possible interest in the Specific Plan. The purpose of the NOP is to provide notification that the City plans to prepare an EIR and to solicit input on the scope and contents of the EIR. Two comment letters were received in response to the NOP. The NOP and the comment letters are included in Appendix A of this Revised Draft EIR.

3.6 SCOPE AND CONTENT

This Revised Draft EIR augments and updates the previous analysis and focuses on the environmental impacts identified as potentially significant, based on results from the City's scoping process, including the comment received in response to the NOP, and based on comments received in response to the circulation of the previous Draft EIR. This Revised Draft EIR includes and incorporates text, exhibits, and reference documents from the previous Draft EIR, where appropriate. The environmental issues evaluated in this Revised Draft EIR are the following:

- Land Use and Planning
- Population and Housing
- Geology and Soils
- Hydrology and Water Quality

- Biological Resources
- Air Quality
- Traffic and Circulation
- Noise
- Public Services and Utilities
- Visual Quality and Aesthetics
- Historical, Cultural, and Archaeological Resources
- Hazards and Hazardous Materials

3.7 IMPACTS, MITIGATION MEASURES, AND UNAVOIDABLE SIGNIFICANT IMPACTS

In accordance with Guidelines §315123, a summary of the impacts of the Specific Plan is provided in Table 3-1 at the end of this section. Also provided in Table 3-1 are mitigation measures that are recommended to bring, wherever feasible, impacts of the Specific Plan to within identified thresholds of significance. Finally, the table indicates whether implementation of the recommended mitigation measures can reduce impacts to less-than-significant levels.

A majority of the significant or potentially significant impacts of the Specific Plan would be reduced to less-than-significant levels; however, as described in Chapter 5, Other CEQA-Mandated Sections, and Chapter 6, Alternatives, the following impacts would remain significant and unavoidable after implementation of the identified mitigation measures for the Proposed Project, the Low Density alternative, and the Residential Focus alternative.

- Impact 4.11-3: Potential Alteration of or Other Effects on Historical Resources
- Impact 4.11-5: Possible Discovery of Human Remains

In addition, cumulative growth in Marin County, and in the City of Larkspur, would result in cumulative impacts on cultural resources and consequent loss of those resources throughout the region if cumulative growth would also result in the damage or destruction of historic and archaeological resource, as well as of unknown archaeological resources, such as human remains. The impact caused by the loss of these sites is considered significant and unavoidable.

3.8 PERMITS AND OTHER APPROVALS THAT MAY USE THIS EIR TO IMPLEMENT THE PROJECT

The first set of approvals that will be considered by the Planning Commission and City Council will include amendments to the General Plan and the Downtown Specific Plan, adoption of the Specific Plan, and rezoning of Subarea 3 to Planned Development District, with the adoption of the Specific Plan as the Preliminary Development Plan. These actions are just the first steps in a chain of contemplated City actions that will guide the ultimate development of the Specific Plan area. Subsequent City entitlements must be granted and other actions must occur before site development. The information included in this EIR will be used by the City and other regulatory agencies in deciding whether to grant permits or approvals necessary to construct and operate proposed projects.

3.9 ALTERNATIVES TO THE PROPOSED PROJECT

Guidelines §15126.6(a) requires that an EIR include a comparative evaluation of the proposed project with alternatives to the project that are capable of attaining most of the project's basic objectives. CEQA requires an evaluation of a "range of reasonable" alternatives. The "Proposed Project" analyzed in this Revised Draft EIR was based on the theoretical maximum density and intensity of land use that could be developed on the Specific Plan area given the policies in the proposed Specific Plan. As discussed in Chapter 6, Alternatives to the Proposed Project, the following three alternatives to this "Proposed Project" were considered:

- *The No Project Alternative* is required by CEQA. Under this alternative, the Subarea 3 of the Specific Plan area would remain much as it is today. New commercial and residential uses that are consistent with the City's General Plan and the Larkspur Downtown Specific Plan may occur in Subarea 1 and Subarea 2. There would be no significant and unavoidable impacts under this alternative.

- *The Low Density Alternative* is designed to enable development within the Specific Plan area at residential and commercial retail densities considerably lower than anticipated under the Proposed Project, while meeting the City's objectives for a mix of land uses and including a community center, hotel/inn, and a mix of housing types. This alternative would have the same number of significant and unavoidable impacts as the Proposed Project.

- *The Residential Focus Alternative* is designed to maximize residential development within the Specific Plan area by providing for residential densities higher than anticipated under the Proposed Project while retaining a mix of land uses. Similar to the Proposed Project, this alternative does not include a community center. This alternative would have the same number of significant and unavoidable impacts as the Proposed Project.

3.10 EVALUATION OF ALTERNATIVES AND IDENTIFICATION OF THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Guidelines §§15126.6(e)(1), 15126.6(e)(2) state that the EIR shall identify an "environmentally superior" alternative based on the comparative analysis among project alternatives (but not including the No Project Alternative).

Impacts of each of the alternatives were compared to those of the Proposed Project to assess for lesser, similar or greater impacts (see Table 6-5 in Section 6, Alternatives). Based on this comparisons, the No Project Alternative would be regarded as the environmentally superior alternative; however, the No Project Alternative meets none of the objectives of the Specific Plan, would not help the City to meet its fair share of the regional housing need, and would not add to the supply of housing that might be available for those in the local workforce.

When the No Project Alternative has been identified as the environmentally superior alternative, CEQA requires that an additional alternative be identified as the environmentally

superior alternative in the absence of the No Project Alternative. Because the Low Density Alternative would result in reduced number and severity of impacts, it would be regarded as the environmentally superior alternative in the absence of the No Project Alternative. However, this alternative would make less of a contribution toward helping the City to meet its fair share of the regional housing need than would either the Proposed Project or the Residential Focus Alternative.

3.11 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED DURING ENVIRONMENTAL REVIEW

As mentioned above, in June 2002 the previous Draft EIR was circulated for a 45-day review period. A number of substantive comments were received on the previous Draft EIR stating concerns about various issues, most notably traffic levels, protection of biological resources, and cultural resources/community character and opportunities for environmental review of individual development projects. Based on this input, the City has revised the 2001 Draft Specific Plan and recirculated this Revised Draft EIR, which, where possible, addresses the concerns addressed in the comments on the previous Draft EIR. The City will not individually respond to those comments received during the earlier circulation period, and requests that reviewers submit new comments on the Revised Draft EIR. The City will respond to all comments received during the recirculation period.

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.1 LAND USE AND PLANNING			
4.1-1: Potential Inconsistency with Policies of Larkspur General Plan	LTS	No mitigation is necessary for this impact.	N/A
4.1-2: Potential Inconsistency with Larkspur Downtown Specific Plan	LTS	No mitigation is necessary for this impact.	N/A
4.1-3: Potential Incompatibility of Future Development Projects with Onsite and Surrounding Land Uses	LTS	No mitigation is necessary for this impact.	N/A
4.1-4: Potential Conversion of Farmland to Nonagricultural Use, Conflict with Existing Zoning for Agriculture, or Conflict with a Williamson Act Contract	LTS	No mitigation is necessary for this impact.	N/A
4.2 POPULATION AND HOUSING			
4.2-1: Inducement of Substantial Population Growth	LTS	No mitigation is necessary for this impact.	N/A
4.2-2: Displacement of Existing Housing or Population	LTS	No mitigation is necessary for this impact.	N/A
4.3 GEOLOGY AND SOILS			
4.3-1: Increased Exposure to Strong Seismic Ground Shaking	LTS	No mitigation is necessary for this impact.	N/A
4.3-2: Potential for Seismic-Related Ground Failure, Including Liquefaction	LTS	No mitigation is necessary for this impact.	N/A

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.3-3: Soil Erosion During Construction Activities	PS	***Prepare and Implement Stormwater Pollution Prevention Plan*** The City shall include the following new policy in the Specific Plan. **New Policy:** To reduce the potential for impacts on Larkspur and Corte Madera Creeks from soil erosion caused by grading and other construction activities, the developer for either public or private projects shall prepare an Erosion Control Plan for any construction activity, including those that involve less than one acre of disturbance area, to control the potential for stormwater to erode site soils and cause them to enter the creeks. The plan, which shall be in the form of a SWPPP, shall be reviewed and approved by the City and the San Francisco Bay Regional Water Quality Control Board (RWQCB) prior to the issuance of construction permits and shall be implemented during construction activities and for the next rainy season following completion of construction. The Erosion Control Plan shall comply with the City's Grading Ordinance and shall include, but shall not be limited to, the following measures: ▸ Grading/earthmoving shall not occur during the rainy season (October 15–March 15). Should construction proceed during or shortly after wet-weather conditions at any time of year, the geotechnical engineer in the field at the time of grading/earthmoving shall provide specific wet-weather grading/earthmoving recommendations.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		▸ A vegetated buffer shall be protected during grading/ earthmoving next to Larkspur Creek. This buffer shall be at least 50 feet wide from the top of the bank on the north/south reach of the creek at the eastern edge of the Specific Plan area, and at least 25 feet wide from the top of bank on the east/west reach of the creek at the southern edge of the Specific Plan area. The conditions of all development permits within Subarea 3 and all subsequent grading permits shall both specify that before the start of any grading, orange barrier fencing shall be installed at the outer edge of the protected buffer area. The fencing shall be maintained until all construction activities have ceased. No construction activity, including the storage of construction materials, or vehicles staging or maneuvering, shall be permitted in the buffer area. ▸ Silt fencing and straw bales shall be used along Larkspur Creek to trap any silt flows from unvegetated ground.	
4.3-4: Damage to Onsite Foundations and Other Structures Caused by Soil Compressibility and Secondary Consolidation Settlement.	LTS	No mitigation is necessary for this impact.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.3-5 a and b: Damage to Underground Utilities Caused by Corrosive Soils.	PS	***(a) Implement Mitigation Measure*** The City shall implement Mitigation Measure 4.3-4, Submit Geotechnical Testing and Engineering Design Report, to mitigate the potential for damage to underground utilities from corrosive soils. ***(b) Backfill with Noncorrosive Soil and Use Corrosion-Resistant Materials*** The City shall include the following new policy in the Specific Plan. **New Policy:** Utility line excavations shall be backfilled with noncorrosive soil backfill materials or pipelines shall be constructed of corrosion-resistant materials.	LTS
4.3-6: Destabilization of Excavations and Trenches	LTS	No mitigation is necessary for this impact.	N/A
4.3-7: Potential for Surface Fault Rupture	LTS	No mitigation is necessary for this impact.	N/A
4.3-8: Exposure to Landslides	LTS	No mitigation is necessary for this impact.	N/A
4.3-9: Loss of Topsoil	LTS	No mitigation is necessary for this impact.	N/A
4.3-10: Potential Expansion of Clay Soils	LTS	No mitigation is necessary for this impact.	N/A
4.4 HYDROLOGY AND WATER QUALITY			
4.4-1: Potential Hazards from Tidal Flooding or Stormwater Flooding	LTS	No mitigation is necessary for this impact.	N/A

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.4-2: Increased Flood Hazards to Downstream Areas from Rainfall Runoff	LTS	No mitigation is necessary for this impact.	N/A
4.4-3: Exceedance of Capacity of Existing Onsite or Adjacent Drainage System	LTS	No mitigation is necessary for this impact.	N/A
4.4-4: Resource Degradation Resulting from Contribution of Sediments or Contaminants to Freshwater or Wetland Areas.	PS	***Implement MM 4.3-3*** The City shall include the following new policy in the Specific Plan. **New Policy:** The City shall require implementation of Mitigation Measure 4.3-3, Prepare and Implement SWPPP, to reduce the contribution of sediments or contaminants to freshwater and wetland areas.	LTS
4.4.5: Temporary Lowering of Groundwater Table and Potential Increase in Salinity	PS	***Implement Groundwater Testing Program in Conjunction with Dewatering*** The City shall include the following new policy in the Specific Plan. **New Policy:** A groundwater testing program shall be implemented in conjunction with any dewatering of the Specific Plan area. This program shall include measures to ensure that dewatering for construction will not result in salinity intrusion. Any water removed during dewatering shall be stored and tested for residual contamination consisting of metals or chlorinated pesticides before disposal.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.4-6: Degradation of Groundwater Quality	PS	***Implement Mitigation Measures 4.4-3 and 4.4-5*** The City shall include the following new policy in the Specific Plan. **New Policy:** The City shall require implementation of Mitigation Measure 4.4-3, Prepare and Implement SWPPP, and Mitigation Measure 4.4-5, Implement Groundwater Testing Program in Conjunction with Dewatering, for all development in the Specific Plan area in order to reduce the increase in pollutants conveyed to the groundwater table to a less-than-significant level and ensure that site dewatering for construction will not result in groundwater quality impacts.	LTS
4.5 BIOLOGICAL RESOURCES			
4.5-1: Loss of Habitat for Common Plant and Wildlife Species	LTS	No mitigation is necessary for this impact.	N/A
4.5-2a and b: Effects on Larkspur Creek	PS	***(a) Protect Sensitive Salt Marsh Habitat Associated with Larkspur Creek*** The City shall include the following new policies in the Specific Plan to protect and enhance habitat on the banks of Larkspur Creek and in the buffer area. **New Policy:** The developer of Subarea 3 shall prepare and the City shall approve a native plant restoration plan for upland habitat for the Larkspur Creek buffer area. The restoration plan shall be developed by a qualified restoration ecologist, and shall include the following components: proposed methods to eliminate	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		non-native, invasive species; a native plant planting and irrigation plan that considers and is compatible with any water treatment and stormwater detention ponds; a description of a proposed monitoring schedule; and performance standards to ensure that the restoration effort is successful. Target species for removal shall include French and Spanish broom, oleander, Himalayan blackberry, pampas or jubata grass, and fennel. Recommended replacement species include but are not limited to arroyo and Pacific willow, coyote bush, native bunchgrasses, toyon, and coast live oak. Implementation of the native plant restoration plan shall be a condition of day project approvals in Subarea 3. Monitoring reports prepared by a qualified restoration ecologist shall be submitted to the City annually for 5 years. The first report shall be due to the City 12 months following the start of implementation of the restoration plan. **New Policy:** To minimize soil erosion and other secondary impacts on wildlife by pedestrians and cyclists, no bikeways or footpaths will be constructed within the Larkspur Creek buffer area. Permanent fencing designed to discourage people and their pets from entering restored habitat in the buffer area shall be installed along the outside edge of the buffer. **New Policy:** Less than 12 months following the start of implementation of the restoration plan, signage that includes interpretive displays shall be posted on	

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		bikeways and footpaths alerting visitors to the nearby sensitive habitat and explaining the importance of protection of these areas. Signs shall also be posted requiring that all dogs be on leashes and kept out of the setback area. ***(b) Implement Mitigation Measure 4.3-3*** The City shall implement Mitigation Measure 4.3-3, Prepare and Implement an Erosion Control Plan.	
4.5-3: Effects on Terrestrial Special-Status Species	LTS	No mitigation is necessary for this impact.	N/A
4.5-4: Effects on Special-Status Fish	LTS	No mitigation is necessary for this impact.	N/A
4.5-5: Effects on Fish and Wildlife Movement	LTS	No mitigation is necessary for this impact.	N/A
4.6 AIR QUALITY			
4.6-1: Conflicts with the Clean Air Plan	LTS	No mitigation is necessary for this impact.	N/A
4.6-2: Obstruction of Implementation of the Clean Air Plan	LTS	No mitigation is necessary for this impact.	N/A
4.6-3: Violation of Air Quality Standards	PS	***Permit Residential Installation of Natural Gas or Pellet Burning Fireplace Appliances Only*** The City shall include the following new policy in the Specific Plan. **New Policy:** The City shall prohibit residential wood burning appliances and fireplaces and shall permit only natural gas or pellet burning fireplace appliances as a	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		condition of approval of all planned development permits for residential construction. This measure effectively eliminates more than 90% of ROG emissions, thus mitigating emissions below the level of significance. Natural gas and pellet residential heating stove emissions are almost PM10 free; thus, wood smoke impacts would be eliminated. This measure would also control PM10 emissions and avoids contributing to existing violations of the 24-hour and annual PM10 standards. CO and TACs from combustion would also be almost completely eliminated by this measure.	
4.6-4: Health Threats from Potential Construction-Related Release of Asbestos and Lead.	PS	***Implement Mitigation Measure 4.12-2*** The developer shall implement Mitigation Measure 4.12-2, Implement a Demolition Plan, described in Section 4.12, Hazards and Hazardous Materials.	LTS
4.6-5a and b: Substantial Emissions of Dust and Diesel Exhaust During Construction.	PS	***(a) Implement Control Measures to Control Dust that Includes PM10 from Construction Activities*** The City shall include the following new policy in the Specific Plan. **New Policy:** The City shall condition all future development permits to require implementation of effective and comprehensive dust control measures. Implementation of feasible controls, outlined below, can substantially reduce construction PM_{10} emissions. Construction activities are also subject to BAAQMD Regulation VIII, which requires suppressing dust	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		emissions from all sources of dust generation using water, chemical stabilizers, and/or vegetative ground cover. Implementing fugitive dust control measures can greatly reduce adverse impacts. According to BAAQMD, estimating the amounts of construction dust from a particular project is at best imprecise. The air district prefers to evaluate construction dust significance by project size and proximity to sensitive receptors. Potential adverse impacts then determine which control measures will be implemented. The Specific Plan area is near existing sensitive receptors (residences, schools) and would thus need the most stringent control measures recommended by the BAAQMD. These measures, stated below, would reduce construction dust to the maximum extent feasible (by 70% or more). Therefore, the construction contractor shall implement all of the following measures: 1. Water all active construction areas at least twice daily and more often during windy periods. Active areas adjacent to residences should be kept damp at all times. 2. Cover all hauling trucks or maintain at least 2 feet of freeboard. Pave, apply water at least twice daily, or apply (nontoxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas. 3. Sweep daily (with water sweepers) all paved access	

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		roads, parking areas, and staging areas. Sweep adjacent streets daily (with water sweepers) if visible soil material is deposited onto the road surface. 4. Hydroseed or apply (nontoxic) soil stabilizers to inactive construction areas (previously graded areas that are inactive for 10 days or more). 5. Enclose, cover, water twice daily, or apply (nontoxic) soil binders to exposed stockpiles. 6. Limit traffic speeds on any unpaved roads to 15 mph. 7. Install sandbags or other erosion control measures to prevent silt runoff to public roadways. 8. Replant vegetation in disturbed areas as quickly as possible. 9. Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the construction site. 10. Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph. 11. Designate an air quality coordinator for the project. Prominently post a phone number for this person on the job site, and distribute same to all nearby residents and businesses. The coordinator will respond to and remedy any complaints about dust, exhaust, or other air quality concerns. A log shall be kept of all complaints and how and when the problem was remedied.	

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		(b) Implement All Feasible and Reasonable Control Measures to Reduce Construction Activity TACs. The City shall include the following new text and policy in the Specific Plan. **Text:** Diesel exhaust is a major source of fine particles, as well as more than 40 substances that are listed as hazardous pollutants. The BAAQMD CEQA Guidelines recognize use of alternatively fueled construction equipment as an effective mitigation. Low-emission fuels are currently available to minimize construction equipment TAC emissions. Engine tuning and control equipment retrofit would help minimize emissions of NO_X that contributes to PM_{10} and $PM_{2.5}$. 100% biodiesel fuel, called B100, reduces TAC emissions by approximately 80% to 90%. Ultra-low sulfur fossil diesel fuel (less than 15 ppm by weight) also significantly reduces PM_{10}. Oxidation catalysts or catalytic particulate filters are now available for many types of diesel equipment. These systems require biodiesel or CARB ultra low-sulfur diesel fuel. These systems in combination with ultra-low sulfur diesel can reduce emissions of fine particulates and toxic hydrocarbons by 90 percent or more. CARB-approved commercially available fuel additives, such as PuriNOx, reduce emissions of both NO_X and PM_{10} by 20% to 40%, depending on equipment.	

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		New Policy: The City shall require all onsite construction and grading equipment to implement the following three emission control techniques: 1. Use biodiesel fuel for all onsite diesel powered equipment. For equipment with engines built in 1994 or later, B100 shall be used. In pre-1994 engines, B-20 fuel (a mixture of 20% biodiesel and 80% fossil diesel fuel) may be used if necessary. If B20 is used, the fossil diesel component should be CARB ultra low-sulfur fuel. OR Use an oxidation catalyst or catalytic particulate filter on all diesel powered equipment rated above 50 horsepower. 2. Use PuriNOx additive or equivalent. 3. Tune vehicle engines to produce minimum NO_X, typically by engine retard of 4–8 degrees. This can reduce emissions by an additional 5%.	
4.6-6: Creation of Objectionable Odors Affecting a Substantial Number of People	LTS	No mitigation is necessary for this impact.	N/A

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.7 TRAFFIC AND CIRCULATION			
4.7-1: Unacceptable Level of Service at Doherty Drive/Riviera Circle/Redwood High School Intersection	S	***Install Traffic Signal at Doherty Drive/Riviera Circle/Redwood High School.*** Installation of a traffic signal will establish an acceptable LOS to the Doherty Drive/Riviera Circle/Redwood High School intersection. A traffic signal shall be installed at this intersection. The City has a Traffic Impact Fee (TIF), §18.15 of the City Municipal Code. Installation of a traffic signal at the Doherty Drive/Riviera Circle/Redwood High School intersection is a project presently included within the City's TIF. Payment of the fee is required of all new development and is assessed by the City upon the issuance of a building permit. With implementation of this measure, the intersection would be expected to operate at acceptable LOS B during the a.m. and p.m. peak hour.	LTS
4.7-2: Unacceptable Level of Service at East Ward Street/Magnolia Avenue Intersection	S	***Remove Parking and Add Southbound and Westbound Left Turn Lanes at East Ward Street/Magnolia Avenue.*** Additional capacity shall be created at the East Ward Street/Magnolia Avenue intersection by removing approximately four parking spaces from the west curb face of Magnolia Avenue directly north of East Ward Street. Removal of these spaces would allow for the striping of a southbound left turn bay. In addition, approximately four parking spaces shall be removed from the south curb face of East Ward Street east of	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		Magnolia Avenue to create space for a westbound left turn bay. Removal of parking and addition of the left turn lanes is a project presently included within the TIF. Payment of the fee is required of all new development and is assessed on the issuance of a building permit. There can be a delay between the payment of required fees and the construction and completion of an identified improvement. The City shall monitor new construction to assure that traffic improvements are installed in a timely manner to mitigate impacts. Under Existing Plus Specific Plan conditions and upon completion of the proposed mitigation measure, the intersection would operate acceptably at LOS C during the a.m. and p.m. peak hours.	
4.7-3: Unacceptable Level of Service at King Street/Magnolia Avenue Intersection	S	***Install Traffic Signal at King Street/Magnolia Avenue.*** A traffic signal shall be installed at the King Street/Magnolia Avenue intersection. Installation of this traffic signal is a project presently included within the TIF. Payment of the fee is required of all new development and is assessed by the City on the issuance of a building permit. Upon installation of the traffic signal, the King Street/Magnolia Avenue intersection is projected to operate acceptably at LOS B during the a.m. peak hour and LOS C during the p.m. peak hour. The City shall monitor new construction to assure that the traffic signal is installed in a timely manner to mitigate the impact.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.7-4: Access and Circulation	LTS	No mitigation is necessary for this impact.	N/A
4.7-5: Pedestrian and Bicycle Circulation	LTS	No mitigation is necessary for this impact.	N/A
4.7-6: Increase in Parking Demand	LTS	No mitigation is necessary for this impact.	N/A
4.7-7: Construction Related Traffic	PS	***Prepare and Implement Detailed Construction Traffic Control Plan.*** The City shall include the following new policy in the Specific Plan: **New Policy:** Construction contractor(s) in the Specific Plan area shall be required to prepare a detailed construction management plan(s) prior to beginning work within the Specific Plan area. The plans shall provide information related to duration of the construction, size of work force, average daily truck deliveries, proposed truck routes to and from the construction site, and hours/days of operation. The plans shall include traffic control measures specific to each construction site and vicinity; such measures may include the following: ‣ Preparation and filing of a detailed construction management plan by the contractor. ‣ Provision of on-site staging area for all equipment and material deliveries ‣ Provision of on-site parking for construction work force.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		▸ To the extent possible, control of delivery truck activity to off-peak periods. ▸ Use of a flag person as needed during the heaviest construction periods.	
4.7-8: Unacceptable Cumulative Level of Service at Doherty drive/Riviera Circle/Redwood High School Intersection.	S	***Implement Mitigation Measure 4.7-1, Install Traffic Signal at Doherty Drive/Riviera Circle/Redwood High School.*** Mitigation Measure 4.7-1 shall be implemented at Doherty Drive/Riviera Circle/Redwood High School intersection as described above under Project-level Mitigation Measures. Under the Existing Plus Cumulative Plus Specific Plan conditions and upon completion of the proposed mitigation measures, the intersection would operate at LOS C and B, respectively, during the A.M. and P.M. peak hours. This mitigation measure would reduce the impact to a level that is less than significant.	LTS
4.7-9: Unacceptable Cumulative Level of Service at East Ward Street/Magnolia Avenue Intersection	S	***Expand Mitigation Measure 4.7-2 to Add an Additional Northbound Left Turn Lane at King Street/Magnolia Avenue.*** A northbound left turn lane shall be created at this intersection with the removal of approximately two to three parking spaces from the east curb face of Magnolia Avenue located directly south of East Ward Street. Under Existing Plus Cumulative Plus Specific Plan conditions and upon completion of the proposed mitigation measure the intersection would operate	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		acceptably at LOS C during the a.m. and p.m. peak hours. This mitigation would reduce the impacts to levels that are less than significant.	
4.7-10: Unacceptable Cumulative Level of Service at King Street/Magnolia Avenue Intersection.	S	***Implement Mitigation Measure 4.7-3, Install Traffic Signal at King Street/Magnolia Avenue.*** Mitigation Measure 4.7-3, which is applicable to the intersection of King Street/Magnolia Avenue, shall be implemented as described above under Project-level Mitigation Measures. Under the Existing Plus Cumulative Plus Specific Plan conditions and upon completion of the proposed mitigation measures, the intersection would operate at LOS B and C, respectively, during the A.M. and P.M. peak hours. This mitigation measure would reduce the impact to a level that is less than significant.	LTS
4.7-11: Unacceptable Cumulative Level of Service at Wornum Drive/Tamal Vista Boulevard Intersection.	S	***Reconfigure Northbound Approach to Provide Dedicated Right Turn and Through Lane at Wornum Drive/Tamal Vista Boulevard.*** The City shall coordinate with the City of Corte Madera to ensure the completion of a dedicated northbound right turn lane by widening the northbound approach on Tamal Vista Boulevard. Implementation of this mitigation measure may make it necessary to restrict left turn movements in and out of the North Sandpiper Circle/Tamal Vista Boulevard intersection. Upon implementation of this mitigation measure, the intersection is projected to operate acceptably at LOS C	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		during the a.m. and p.m. peak hours. This mitigation would reduce the impacts to levels that are less than significant.	
4.7-12: Unacceptable Cumulative Level of Service at Fifer Avenue/Tamal Vista Boulevard Intersection.	S	***Optimize and Coordinate Signals at Fifer Avenue/Tamal Vista Boulevard.*** This T-intersection fully utilizes the existing right-of-way, and therefore the opportunity for widening and other physical changes is constrained. The City shall coordinate with the City of Corte Madera to ensure a change in the current traffic signal phasing and timing at this intersection in order to provide more green light time to the heaviest projected traffic movements. Currently, the northbound and southbound traffic travel concurrently after the northbound left turns are completed. In the proposed phasing plan the northbound and southbound traffic would travel exclusively of each other (split-phase) giving additional time to eastbound right turns (320 plus a.m. and p.m. peak hour vehicles). Implementation of this measure will require coordination with the signalized intersection to the south at Wornum Drive/Tamal Vista Boulevard. Upon implementation of this mitigation measure, the intersection is projected to operate acceptably at LOS C during the a.m. peak hour and LOS D during the p.m. peak hours. This mitigation would reduce the impacts to levels that are less than significant.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.7-13: Unacceptable Cumulative Level of Service at Doherty Drive/Piper Park Intersection. ** If the City chooses not to implement mitigation at the Doherty Drive/Piper Park Intersection, this impact would be significant and unavoidable.	S	***Install Traffic Signal at Doherty Drive/Piper Park.*** Installation of a traffic signal at this intersection would result in an acceptable level of service operations following development in the Specific Plan area. With implementation of this measure, the intersection would be expected to operate at acceptable LOS B during the a.m. and p.m. peak hour. This mitigation would reduce the impacts to levels that are less than significant. However, Mitigation Measure 4.7-13 would not likely be implemented at this location based on a number of objective criteria and engineering best practice measures. The intersection fails to meet the City threshold of LOS C or better for unsignalized intersections, based solely on the delay that would be experienced by the southbound approach vehicles. This is less than 20 vehicles per peak hour under all analysis scenarios. Many unsignalized intersections in both urban and suburban settings operate with failing minor approach streets. The criteria used to decide the appropriateness of a traffic signal covers a wide range of safety and quantitative data. One measure is found in the Caltrans publication, Traffic Manual–Traffic Signals & Lighting, Chapter 9, July 1996. The manual provides 11 Traffic Signal Warrants based on minimum vehicle volumes, pedestrian volumes, location (school area) and intersection accident history among others.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		A review of the Caltrans warrants indicates that the intersection at Doherty Drive/Piper Park would not meet the peak hour volume warrant (Warrant 1) and would not likely meet any of the other 10 warrants.	
4.8 NOISE			
4.8-1: Incompatibility of Noise Sensitive Land Uses with Existing Noise Environment	PS	***(a) Conduct Acoustical Evaluation.*** The City shall include the following new policy in the Specific Plan. **New Policy:** Site plans for all development projects within the Specific Plan area shall be evaluated by an acoustical engineer to ensure that residential outdoor use areas are protected to a level not in excess of an Ldn of 55 dBA. The acoustical evaluation shall be reviewed by the City. Measures that could be used to achieve reduction in noise are increasing the distance between the outdoor use areas and any noise sources (for example, the Albertsons loading dock), using the buildings themselves to shield outdoor spaces, and constructing sound walls, earth berms, or combined sound walls and earth berms adjacent to noise sources. ***(b) Provide Mechanical Ventilation.*** The City shall include the following new policy in the Specific Plan. **New Policy:** Mechanical ventilation, which may include air condition or fans, shall be required where the	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		outdoor noise level at the exterior of new residential uses exceeds an Ldn of 60 dBA.	
4.8-2: Increased Noise Levels during Construction	PS	***Minimize Amount and Duration of Noise Intrusion During Construction and Take Measures to Correct Problems.*** The City shall include the following new policy in the Specific Plan. **New Policy:** The developer shall take the following measures to minimize noise intrusion during construction in the Specific Plan area: 1. Limit construction to the hours of 7 a.m. to 6 p.m. on weekdays, and 9 a.m. to 5 p.m. on Saturdays, Sundays, or legal holidays in accordance with Chapter 9.54 of the Larkspur Municipal Code. 2. Ensure that all equipment driven by internal combustion engines are equipped with mufflers that are in good condition and appropriate for the equipment. 3. Use "quiet" models of air compressors and other stationary noise sources where technology exists. 4. Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a remediation or construction project area. 5. Prohibit unnecessary idling of internal combustion engines.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		6. Designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaints (e.g., starting too early, bad muffler) and institute reasonable measures warranted to correct the problem. Post the telephone number for the disturbance coordinator at a location clearly and easily visible to the public on the construction site.	
4.8-3: Increase in Traffic Noise	LTS	No mitigation is necessary for this impact.	N/A
4.8-4: Potential Increase in Vibration	LTS	No mitigation is necessary for this impact.	N/A
4.9 PUBLIC SERVICES AND UTILITIES			
4.9-1: Potential for Exceedance of School Student Capacity	LTS	No mitigation is necessary for this impact.	N/A
4.9-2: Increase in Use of Parks and Other Recreational Facilities	LTS	No mitigation is necessary for this impact.	N/A
4.9-3: Increased Demand for Police Services	LTS	No mitigation is necessary for this impact.	N/A
4.9-4: Increased Demand for Fire Protection and Emergency Medical Response Services	LTS	No mitigation is necessary for this impact.	N/A
4.9-5: Increased Demand for Water Supply, Conveyance, Water Storage, or Water Treatment Services	LTS	No mitigation is necessary for this impact.	N/A

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.9-6: Increased Demand for Wastewater Treatment Services	LTS	No mitigation is necessary for this impact.	N/A
4.9-7: Need for Improvements to Stormwater collection System	LTS	No mitigation is necessary for this impact.	N/A
4.9-8: Increase in Solid Waste Disposal	LTS	No mitigation is necessary for this impact.	N/A
4.10 VISUAL QUALITY AND AESTHETICS			
4.10-1: Potential Interference with Scenic Vistas	LTS	No mitigation is necessary for this impact.	N/A
4.10-2: Potential Damage to Scenic Resources	LTS	No mitigation is necessary for this impact.	N/A
4.10-3: Potential Degradation of Visual Character	LTS	No mitigation is necessary for this impact.	N/A
4.10-4: Potential Changes in Views Associated with New Sources of Light or Glare	LTS	No mitigation is necessary for this impact.	N/A
4.11 CULTURAL RESOURCES			
4.11-1: Potential Direct or Indirect Destruction of Unique Paleontological Resources	LTS	No mitigation is necessary for this impact.	N/A
4.11-2: Potential Damage to or Destruction of Archaeological Resources	PS	***(a) Implement Archaeological Testing Program*** The City shall include the following new policy in the Specific Plan. **New Policy:** An archaeological subsurface testing program to delineate and define the elements of CA-	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
**If archaeological resources are found in the subsurface testing program, and destruction of the archaeological resources cannot be avoided, Impact 4.11-2 would be considered significant and unavoidable.		MRN-68 shall be implemented before the beginning of construction. The archaeologist will make a preliminary assessment of NRHP and CRHR eligibility based on the results of the testing. If CA-MRN-68 is found to be potentially eligible for listing, then destruction of this site must be avoided. ***(b) Monitor Construction*** The City shall include the following new policy in the Specific Plan. **New Policy:** A professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, and a Native American observer (identified through the Native American Heritage Commission) shall be present to monitor ground disturbing activities within the Specific Plan area. In the event that any archaeological resources are uncovered within the Specific Plan area during future remediation or construction activity associated with the implementation of the Specific Plan, there shall be no further excavation or disturbance of the site or any nearby area until the archaeologist has evaluated the find and appropriate site-specific mitigation has been identified to protect, preserve, remove, or restore the artifacts uncovered.	
4.11-3: Alteration of or Other Effects on Historical Resources	S	**Document Historic Structures** The City shall include the following new policy in the Specific Plan.	SU

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		New Policy: The Niven Nursery structures that appear to be eligible for listing in the CRHR shall be documented according to Historic American Buildings Survey (HABS) standards. This task shall be performed by a qualified Architectural Historian who meets the Secretary of the Interior's Standards and Guidelines, and shall be accomplished by those proposing development of Subarea 3 and approved by the City Planning Department before any demolition permit for that property is issued. As indicated in the State CEQA Guidelines (Guidelines §15126.4(b)(2)), "In some circumstances, documentation of an historic resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur." Although documentation would mitigate the demolition of these structures to some extent, it would not reduce the effects of demolition to a less-than-significant level, and demolition of these structures would remain a significant and unavoidable impact associated with implementation of the Specific Plan.	
4.11-4: Potential Direct or Indirect Destruction of Unique Geologic Features	LTS	No mitigation is necessary for this impact.	N/A

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.11-5: Possible Discovery of Human Remains ** If human remains are found during construction, and development of the site cannot be avoided, then Impact 4.11-5 would be considered significant and unavoidable	PS	***Stop Potentially Damaging Work if Human Remains are Uncovered During Construction, Assess the Significance of the Find, and Pursue Appropriate* Management** The City shall include the following new policy in the Specific Plan. **New Policy:** California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code §7050.5 and §7052 and CEQA §5097. In accordance with the California Health and Safety Code, if human remains are uncovered during construction at the project site, the construction contractor shall immediately halt potentially damaging excavation and notify the City or the City's designated representative. The City shall immediately notify the coroner. The California Health and Safety Code states that if human remains are found in any location other than a dedicated cemetery, excavation must to be halted in the immediate area, and the county coroner is to be notified to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (California Health and Safety Code §7050.5[b]). If the coroner determines that the remains are those of a Native American, he or	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		she must contact the Native American Heritage Commission by phone within 24 hours of making that determination (California Health and Safety Code §7050[c]). The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in CEQA §5097.9.	
4.12 HAZARDS AND HAZARDOUS MATERIALS			
4.12-1a and b: MTBE and Hydrocarbons in Groundwater at Larkspur Service Station Site	PS	***(a) Protect Construction Workers and Public Against Exposure to MTBE.*** The City shall include the following new policy in the Specific Plan. **New Policy:** When any construction work is undertaken in the Specific Plan area, the following measures shall be incorporated into the project prior to the issuance of construction permits and implemented during construction activities to prevent construction workers and the public from coming into contact with MTBE: ‣ Construction personnel should wear appropriate construction clothing (i.e., long pants, hard hat, gloves) during construction to minimize potential contact with groundwater containing MTBE. This clothing shall be in compliance with the requirements for construction personnel issued by Cal/OSHA and OSHA. ‣ Appropriate notices shall be posted at the project site to warn construction personnel and public of the	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		presence of contaminated groundwater. ‣ The City and the San Francisco Bay RWQCB shall be notified immediately if discolored or odorous groundwater is encountered during excavation activities. ‣ When not under active construction or remediation, open trenches shall be covered where contaminated groundwater is present to prevent the public from coming in contact with contamination. ***(b) Prepare and Implement Dewatering Plan, and Install Impermeable Membrane Around Excavation Area if Necessary.*** The City shall include the following new policy in the Specific Plan. **New Policy:** The contractor for any construction work undertaken in the Specific Plan area shall prepare a dewatering plan and submit the plan to the City and the San Francisco Bay RWQCB for approval prior to issuance of construction permits. Dewatering of the excavation areas shall be performed in compliance with the occupational safety and health guidelines of Cal/OSHA and OSHA, and in a manner that allows discharge to the sanitary sewer system. If dewatering is not required, groundwater shall be tested to determine the presence of MTBE or other hydrocarbons, and water shall be treated using appropriate methods approved by the City and the San Francisco Bay	

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		RWQCB. Any water removed during dewatering shall be stored and tested for residual contamination before disposal. Water shall also be tested after treatment to ensure that constituent levels meet requirements for surface or groundwater discharge before disposal or infiltration. If necessary, an impermeable membrane shall be installed around the excavation area to prevent contaminants from reaching Larkspur Creek.	
4.12-2: Demolition-Related Release of Hazardous Materials, Including Materials Containing Lead and Asbestos	PS	***Implement a Demolition Plan***. The City shall include the following new policy in the Specific Plan. **New Policy:** Site surveys for the presence of potentially hazardous building materials shall be reviewed/performed, and a demolition plan for safe demolition of existing structures in Subarea 3 shall be incorporated into the project prior to the issuance of construction permits and implemented during construction activities. The demolition plan shall address protection of both onsite workers, offsite residents, and occupants in nearby schools from chemical and physical hazards. The demolition plan shall be reviewed and approved by DTSC and by the City. All contaminated building materials shall be tested for contaminant concentrations and shall be disposed of at appropriate licensed landfill facilities. Before demolition, hazardous building materials such as peeling, chipping, and friable lead-based paint, window	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		glazing, and building materials containing asbestos shall be removed in accordance with all applicable guidelines, laws, and ordinances. The Demolition Plan shall include a program of air monitoring for dust particulates and attached contaminants. Dust control and suspension of work during dry windy days shall be addressed in the Demolition Plan. Before a demolition permit is obtained from the BAAQMD, an asbestos demolition survey shall be conducted in accordance with the requirements of BAAQMD Regulation 11, Rule 2. The California Division of Occupational Safety and Health (DOSH) and OSHA do not define threshold limit values for lead-containing paints and, therefore, paints or coatings containing any detectable amounts of lead are regulated by these agencies' standards, if construction activities covered in the scope of these standards emit lead. The DOSH standards prescribe procedures to be followed based on anticipated exposure resulting from construction activities performed. Demolition procedures may involve potential worker exposure above the DOSH action level for lead. Therefore, the requirements of Guidelines §1532.1 must be followed. These requirements include but are not limited to the following: ▸ Loose and peeling lead-containing paint and window glazing should be removed before building demolition. Workers conducting removal of lead paint and window glazing must receive training in	

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		accordance with Guidelines §1532.1. ▸ The lead paint and window glazing removal project should be designed by a lead project designer, project monitor, or supervisor certified by the DHS. ▸ A written Lead Compliance Plan that that meets the requirements of the lead construction standard must be prepared by any contractor whose actions would have an impact on lead coatings. ▸ Workers conducting removal of lead paint and window glazing must be certified by DHS in accordance with Guidelines §1532.1. ▸ Workers who may be exposed above the Action Level must have blood lead levels tested before commencement of lead work and at least quarterly thereafter for the duration of the project. Workers who are terminated from the project should have their blood lead levels tested within 24 hours of termination. ▸ A written exposure assessment must be prepared in accordance with Guidelines §1532.1. ▸ Any amount of lead waste generated, including window glazing and painted building components, must be characterized for proper disposal in accordance with Title 22, §66261.24. In addition, compliance with BAAQMD Regulation 11, Rule 1, Lead, which contains procedures that limit daily emissions of lead and ensures "a person shall not	

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		discharge an emission of lead, or compound of lead calculated as lead, that will result in ground level concentrations in excess of 1.0 µg/m^3 averaged over 24 hours." This regulation required calculations of and monitoring of lead concentrations to ensure compliance.	
4.12-3: Exposure to Hazardous Materials during Removal of Contaminated Soil	PS	***Implement Removal Action Workplan and Health and Safety Plan.*** The City shall include the following new policy in the Specific Plan. **New Policy:** The RAW developed for Subarea 3, under the oversight of DTSC, shall be incorporated into the project prior to the issuance of construction permits and implemented during construction activities. The workplan includes provisions for safe removal, transportation, and disposal of selected contaminated soil from Subarea 3. Removal of contaminated soils from the areas identified would reduce the cancer risk to less than 1 in 1 million. Clean fill shall also be placed over much of Subarea 3, further reducing the potential for exposure of people to residual soil contamination. A detailed Health and Safety Plan shall be prepared to address measures to protect workers and the community during remedial activities, and shall be reviewed and approved by DTSC.	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
4.12-4: Development on Hazardous Materials Sites	PS	***Implement Mitigation Measure 4.12-3.*** The City shall implement Mitigation Measure 4.12-3, Implement Removal Action Workplan and Health and Safety Plan, described above.	LTS
4.12-5: Release of Contaminated Groundwater	PS	***Implement Groundwater Testing, Storage, Treatment, and Disposal.*** The City shall include the following new policy in the Specific Plan. **New Policy:** Any groundwater removed from excavations in Subarea 3 during construction shall be temporarily stored and tested to determine the appropriate method of treatment and/or disposal. Provisions for this measure shall be incorporated into the project prior to the issuance of construction permits.	LTS
4.12-6: Potential Contamination of Soils Near Redwood High School, San Andreas High School, and Hall Middle School	PS	***Implement Demolition Plan and Removal Action Workplan.*** The City shall include the following new policy in the Specific Plan. **New Policy:** The proposed hazardous materials remediation plans and actions for Subarea 3 shall be implemented to reduce the overall risk to students at the nearby Redwood High School and Hall Middle School. During the demolition and remediation process, special measures shall be taken in accordance with an approved Demolition Plan and RAW to contain and remove potentially hazardous substances and wastes under controlled conditions. These plans, which must be	LTS

TABLE 3-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		approved by the City prior to the issuance of construction permits, shall address approved routes, truck cleaning and inspection, and contingencies for addressing spills and other accidents.	
4.12-7: Potential Interference with Airport Operations	LTS	No mitigation is necessary for this impact.	N/A
4.12-8: Interference with an Adopted Emergency Response or Emergency Evacuation Plan	LTS	No mitigation is necessary for this impact.	N/A
4.12-9: Exposure of People or Structures to Wildland Fires	LTS	No mitigation is necessary for this impact.	N/A

NI = No Impact LTS = Less-than-Significant S = Significant PS = Potentially Significant SU = Significant Unavoidable