

CEQA ADDENDUM TO THE 2005 ENVIRONMENTAL IMPACT REPORT FOR THE NOVATO SANITARY DISTRICT WASTEWATER FACILITY PLAN PROJECT

July 27, 2009

This Addendum was prepared in accordance with the California Environmental Quality Act ("CEQA"), and the CEQA Guidelines and is intended to serve as an addendum to the previously certified Final Environmental Impact Report for the Novato Sanitary District Wastewater Facility Plan Project.

A. Introduction

On May 23, 2005, the Novato Sanitary District ("District") adopted Resolution No. 2908 certifying a Final Environmental Impact Report ("2005 EIR") for the Novato Sanitary District Wastewater Facility Plan Project (SCH # 200407203). The 2005 EIR consists of a Draft EIR dated January 20, 2005 and a Response to Comments dated April 26, 2005. The 2005 EIR evaluated the potential environmental effects of the construction and operation of proposed improvements to the Novato Wastewater Treatment Plant ("WWTP") and the Ignacio WWTP. Specifically, the 2005 EIR analyzed the following four project alternatives:

- The Novato Combined WWTP Alternative – Improvements to the Novato WWTP to consolidate treatment processes and conversion of the Ignacio WWTP to a pumping facility.
- The Ignacio Combined WWTP Alternative - Improvements to the Ignacio WWTP to consolidate treatment processes and conversion of the Novato WWTP to a pumping facility.
- The Separate WWTP Alternative – Improvements to both the Novato WWTP and the Ignacio WWTP.
- No Project Alternative – No improvements to either the Novato WWTP or the Ignacio WWTP.

Concurrently with, and based upon, certification of the 2005 EIR, the District approved the Novato Combined WWTP Alternative ("Improvement Project"), and adopted findings concerning significant impacts and mitigation measures, findings regarding alternatives, a statement of overriding considerations and a mitigation monitoring plan. Subsequent to the adoption of the 2005 EIR, the District adopted two Addenda:

- Addendum #1 adopted in October 2005 covered a realignment of a portion of the Ignacio Force Main and a minor extension of the aeration basin access road,
- Addendum #2 adopted in January 2007 covered the realignment of a second section of the Ignacio Force Main.
- Addendum #3 staff level not at Board: Construction layout yard.

Construction of the Improvement Project is currently underway and treatment facilities are being brought online as completed.

Since approval of the Improvement Project, the District has identified the need to augment existing staff and resources with staff and resources experienced with the startup and operation of wastewater facilities similar to the existing, transitional and new facilities comprehended in the Improvement Project ("Project Facilities"). Accordingly, the District issued a Request for Qualifications ("RFQ") for wastewater treatment facility operation, maintenance and management services and then invited three qualified firms to respond to a Request for Proposal ("RFP"). The District is now considering negotiating an Operations, Maintenance and Management Service Agreement ("Service Agreement") with Veolia Water North America Operating Services, LLC ("Contractor"). The proposed terms of the Service Agreement are described in more detail below.

B. Improvement Project Description and Prior Approvals

The District approved the Improvement Project by District Resolution 2908 on May 23, 2005. The Improvement Project consists of expanding the capacity of the Novato WWTP; consolidating the Novato WWTP and Ignacio WWTP; modifying existing treatment facilities at the Novato WWTP; constructing new treatment facilities at the Novato WWTP; converting the Ignacio WWTP to a pumping facility; constructing a new pipeline from the Ignacio pump station to the Novato WWTP; and operating and maintaining the Project Facilities. The approval included findings concerning significant impacts and mitigation measures, findings regarding alternatives, a statement of overriding consideration, and a mitigation monitoring plan.

C. Proposed Service Agreement

The District proposes to negotiate a Service Agreement with Contractor for the contract operation, maintenance and management of the Project Facilities. Pursuant to the Service Agreement, Contractor would be responsible for operating, maintaining and managing the Project Facilities in accordance with all federal, State and local regulations and permits and the specific performance standards set forth in the Service Agreement. Contractor's duties would include, but not be limited to, day-to-day plant operations and monitoring; performing asset management functions; performing scheduled and unscheduled maintenance, repairs, and replacements as needed on infrastructure components; maintaining compliance with the Novato WWTP's National Pollutant Discharge Elimination System ("NPDES") permit and any other regulatory permits, laws, rules and regulations applicable to the operation of the Project Facilities; training and transitioning staff and maintaining records.

The District would retain responsibility for maintaining, cleaning, repairing and constructing the District's sewers and collection system; managing and enforcing the industrial pretreatment program, rate setting, performing meter reading and maintenance, performing outfall repairs and maintenance outside the District's WWTP facilities, performing long-term system and area-wide planning, reviewing and authorizing expenditures for repairs and replacements and capital replacements and upgrades for the Project Facilities.

The Service Agreement would provide the District with the right to review and inspect Contractor's operation, maintenance and management activities. Specifically, the District would have the right to conduct inspections of the Project Facilities at any time to assure that they are being properly operated and maintained in accordance with the Service Agreement. In the event Contractor fails to perform the required maintenance, the District would be permitted to withhold payment of the service fee and hire a third party to perform the required maintenance or may terminate the Service Agreement.

It is expected that the term of the Service Agreement would be five years. However, the District would have the option, in its sole discretion, to extend the Service Agreement for three additional three-year terms.

D. Prior CEQA Analysis and Determinations

The 2005 EIR analyzed the potential environmental impacts of the Improvement Project, including the operation of the Project Facilities. The 2005 EIR identified numerous short-term construction related impacts to geology and soils, water quality, dust generation, traffic, noise, and visual resources and determined that they could be reduced to a less than significant level by implementation of mitigation measures. In addition, the 2005 EIR identified the following long-term operational related impacts and determined that they would either be less than significant, requiring no mitigation beyond the existing regulatory framework (which includes compliance with all permits, laws, rules and regulations applicable to operation of the Project Facility), or could be reduced to a less than significant level by implementation of the mitigation measures described below:

Water Quality

Impact 3.3-1: Possible degradation of ambient water quality could result from increased effluent discharge via the District's existing outfall. (Less than Significant)

Mitigation Measures: None required.

Impact 3.3-2: The increased District effluent discharge would comply with existing NPDES effluent water quality limitations. (Less than Significant)

Mitigation Measures: None required.

Impact 3.3-3: Increased discharge to San Pablo Bay through the existing discharge would have the potential to result in temperature impacts. (Less than Significant)

Mitigation Measures: None required.

Impact 3.3-4: An increase in effluent discharge from the District may result in increased mass loadings to the Bay, with subsequent impacts to water quality. (Less than Significant)

Mitigation Measures: None required.

Air Quality

Impact 3.7-2: Operation of Proposed Project components would result in operational air emissions from pumps, testing and potential use of emergency generators. Emissions from these sources would not be substantial and would not exceed significance criteria of the BAAQMD. (Less than Significant)

Mitigation Measures: None required.

Impact 3.7-3: Project operation would result in odor emissions (Less than Significant with EIR Identified Mitigation)

Mitigation Measure 3.7.3: Consistent with the District's existing covered facilities, measures to eliminate odor from facility sources would be implemented in the design and operation of new equipment. As appropriate, this would include covering of facilities and filtering of air from odor sources prior to release. Additionally, emission points would be located as far as possible from the fresh air intake of adjacent buildings and other sensitive receptors.

Impact 3.7-4: Project operation could result in operational toxic air contaminant (TAC) emissions. (Less than Significant with EIR Identified Mitigation)

Mitigation Measure 3.7.4: Design and operation elements would be used to decrease TAC emissions as required to meet permit requirements. Emission sources would be located as far from any sensitive receptors as much as possible.

Noise

Impact 3.8-2: Operational activities would generate noise levels above existing ambient levels in the project vicinity. (Less than Significant)

Mitigation Measures: None required.

Hazardous Materials

Impact 3.10-3: Increased quantities of hazardous material stored onsite at the Novato and/or Ignacio treatment plants could impact public health in the event of a catastrophic spill or explosion. Adoption of updated Business Plans and compliance with applicable regulations would minimize potential risks. (Less than Significant)

Mitigation Measures: None required.

E. Basis for Decision to Prepare an Addendum

The District analyzed whether the proposed operation, maintenance and management of the Project Facilities by Contractor requires additional environmental review under CEQA. District Staff determined that the operation, maintenance and management of the Project Facilities by Contractor falls within the existing facilities exemption set forth in CEQA Guidelines section 15301 because the existing facilities have been in operation for decades, and the Project which reconstructs and modernizes those facilities has been finally approved based on the 2005 EIR. Moreover, the operation, maintenance and management of the Project Facilities by Contractor involves no expansion of use beyond that considered in the 2005 EIR.

None-the-less, the District has determined that an Addendum is also an appropriate means CEQA review for Contractor's proposed operation, maintenance and management of the Project Facilities. Prior to making this determination, the District reviewed the 2005 EIR and the criteria in CEQA Guidelines Section 15162 to determine if any further environmental review is required. Section 15162 provides that, where an EIR has been certified for a project, no subsequent or supplemental EIR shall be prepared unless the agency determines, based on substantial evidence, that one or more of the following criteria are satisfied:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative;
or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As discussed in detail below, and in the attached Initial Study Checklist, the proposed operation, maintenance and management of the Project Facilities by Contractor does not satisfy any of the foregoing criteria.

(a) There are No Substantial Changes Proposed to the Improvement Project

The proposed operation, maintenance and management of the Project Facilities by Contractor is not a substantial change to the Improvement Project involving new or more severe significant impacts. The proposed transfer of the operation, maintenance and management of the Project Facilities to Contractor will not change the physical capacity, design, configuration, construction, or operation of the Project Facilities. The proposed operation, maintenance and management of the Project Facilities by Contractor would result in the same environmental impacts as the operation, maintenance and management of the Project Facilities by the District, which were previously identified and analyzed in the 2005 EIR. In addition, the mitigation measures identified in the 2005 EIR and adopted by the District as well as all existing Federal, State and local regulatory requirements, will continue to apply to the Improvement Project.

Moreover, the staff operating the plant will remain the same. The Service Agreement will require the Contractor to offer employment to existing District employees, so the skill of the current District employees will not decline and will be augmented with employees of the Contractor who are experienced in starting up and operating facilities similar to the Project Facilities. There is no effect because Contractor's proposal meets all applicable standards with regard to use of skilled and certified employees.

Furthermore, the procedures for maintenance and operation of the Project Facilities will not change. The Service Agreement will require Contractor to operate the Project Facilities pursuant to the same or similar operating and maintenance procedures adopted by the District. The Service Agreement will also require Contractor to comply with all permits, laws, rules and regulations applicable to operation of the Project Facilities.

Accordingly, the operation, maintenance and management of Project Facilities by the Contractor will not result in any new or more severe significant environmental impacts beyond those previously analyzed in the 2005 EIR.

(b) There are No Substantial Changes in the Circumstances Under Which the Project is Undertaken

There are no substantial changes in the circumstances under which the Improvement Project will be undertaken. The proposed operation, maintenance and management of the Project Facilities by Contractor does not involve any changes to the physical design, construction, or operation of the Project Facilities. Moreover, the environmental setting and physical environmental conditions for the area have not changed from those anticipated in the 2005 EIR. The Addenda (as noted above) have been prepared relating to minor construction modifications which became known as a result of preparation of final design documents. With exception of the issues addressed in those Addenda, the facility currently under construction, which is to be operated through contract operations, is the facility evaluated by the 2005 EIR with no substantial changes. There are no changes in the basic design, location or setting of the project, the flow characteristics of the waste stream, the treatment units, location of treatment units, odor control facilities, energy conservation measures or planned treatment plant capacity. The basic means of treatment of the wastewater, and operational activities required to process the wastewater, are unchanged from those contemplated in the 2005 EIR. The Improvement Project will be required to comply with the same environmental permit conditions, regulations and standards, regardless of the specific personnel that operate the facilities or whether operations are undertaken with public employees or by contract with private sector employees. There is no contemplated substantial change in the number of employees, number of vehicle trips required or other factors related to operation of the Improvement Project.

(c) There is No New Information of Substantial Importance

There is no new information of substantial importance that was not known or could not have been known at the time the Improvement Project was approved.

F. Conclusion

This Addendum was prepared pursuant to CEQA Guidelines Section 15164. Through the preparation of this Addendum, the District determines that any minor changes to the Improvement Project arising from operating

the facilities through contract operations, do not require a subsequent EIR under Guidelines Section 15162 because it does not result in new or substantially more severe impacts than those identified in the 2005 EIR.

As provided in Section 15164 of the Guidelines, the Addendum need not be circulated for public review, but the District shall consider the Addendum with the prior 2005 EIR before making a decision on negotiating a Service Agreement with Contractor.

The 2005 EIR and all resolutions cited above are incorporated herein by reference and are available for public review during normal business hours at the District's office located at 500 Davidson Street, Novato, California.

ENVIRONMENTAL CHECKLIST

Initial Study

This Checklist has been adapted from California Environmental Quality Act (CEQA) Guidelines Appendix G.

1. **Project Title:** Novato Sanitary District Wastewater Facility Plan
Project EIR Addendum

2. **Lead Agency Name and Address:** Novato Sanitary District
Board of Supervisors
500 Davidson Street
Novato, CA 94945

3. **Contact Person and Phone Number:** Beverly James
(415) 892-1694 x 111

4. **Project Location:** Novato Sanitary District Wastewater Treatment
Plant

5. **Project Sponsor's Name and Address:** Beverly James
Novato Sanitary District
500 Davidson Street
Novato, CA 94945

6. **Description of Project:** Please refer to Section B, Improvement Project Description and Prior Approvals, and Section C, Proposed Service Agreement above for a description of the Project.

7. **Surrounding Land Uses and Setting.**

The Novato Sanitary District Wastewater Treatment Plant (WWTP) is located in the City of Novato in Marin County California at approximately 38°05'57"N, 122°30'14" at the end of a cul-de-sac lined with single family residences. The north perimeter of the WWTP is adjacent to single family residences. The Novato Marsh exists to the south of the WWTP, and is bordered by District land and open space to the northeast. A full description of the existing setting is included in Chapter 2 of the Novato Sanitary District Wastewater Facilities Plan Project Environmental Impact Report (EIR).

Environmental Factors Potentially Affected

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology, Soils and Seismicity |
| <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Land Use Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation and Traffic |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | |

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

Environmental Checklist

Visual Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
1. AESTHETICS—Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway corridor?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts to visual resources beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.12 of the Novato Sanitary District Wastewater Facility Plan Project EIR analyzed visual resource impacts associated with construction at the Novato WWTP. As noted in Section 3.12 of the EIR, impacts related to construction of the WWTP facilities would not substantially alter the visual character of the facilities. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore there would be no additional impact on scenic vistas, protected visual resources, or ambient light and dark sky conditions.

Agricultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
2. AGRICULTURAL RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.				
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of Statewide Importance to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

There are no agricultural resources within the project area; therefore there is no impact.

Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
3. AIR QUALITY				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts to air resources beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.7 of the Novato Sanitary District Wastewater Facility Plan Project EIR analyzed air quality impacts. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore the project would not violate or conflict with the Bay Area Air Quality Management District (BAAQMD) Air Quality Management Plan or result in any impacts beyond those identified in the EIR.

Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
4. BIOLOGICAL RESOURCES—				
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts to biological resources beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.4 of the Novato Sanitary District Wastewater Facility Plan Project EIR analyzed impacts to vegetation, wildlife, and wetlands. The EIR identified significant impacts including impacts to wetlands/waters of the U.S., disturbance of habitat for special status species, disturbance of nesting habitat, and impacts to common plant and animal species. The EIR identified appropriate mitigation methods for these impacts. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore there would be no additional impact on sensitive plant and wildlife species, or jurisdictional waters. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
5. CULTURAL RESOURCES— Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts to cultural resources beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.6 of the Novato Sanitary District Wastewater Facility Plan Project EIR analyzed impacts to cultural resources. An archival and literature search was conducted at the Northwest Information Center of the California Historical Resources Information System at Sonoma State University and was completed January 29, 2004 (File No. 03-527) (William Self Associates, Inc., *Cultural Resources Assessment of the Proposed Novato Sanitary District Wastewater Facility Plan Project, Marin County, California*, March 2005). This search consisted of a review of maps and site records for an area including the proposed facilities and one half-mile buffer of proposed alignments. Although Native American archaeological sites within ½ mile radius of the project were identified, these sites are not located within proximity of proposed facilities, or have been destroyed by previous development. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore, there would be no additional impact on sensitive historic, cultural, or paleontological resources. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Geology, Soils, and Seismicity

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

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Section 3.1 of the Novato Sanitary District Wastewater Facility Plan Project EIR describes the geologic, seismic, and soil conditions within the project area. The EIR identified potentially significant impacts including soil erosion, potentially corrosive soils, intense groundshaking and liquefaction from earthquakes. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore no new or more severe impacts from geologic and soil hazards beyond those identified in the EIR would occur. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
7. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts associated with hazardous materials beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.9 of the Novato Sanitary District Wastewater Facility Plan Project EIR analyzed hazardous materials impacts associated with implementation of Segment E

on Rowland Way and construction of the Novato WWTP. For the purposes of this EIR analysis, ESA retained Environmental Data Resources (EDR) of Southport, Connecticut to conduct a regulatory database search of sites adjacent to and in the vicinity of the project area that are listed on agency files for the documented use, storage, generation, or releases of hazardous materials or petroleum products. The database search process reviews several lists generated by federal, state, county, and/or city regulatory agencies for historically contaminated properties, businesses that use, generate, or dispose of hazardous materials or petroleum products in their operation. In addition, the EDR search reviews lists of active contaminated sites that are currently undergoing monitoring and remediation. The search consisted of a review of maps and site records for an area including the proposed facilities and 1/4-mile buffer of proposed alignments. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities, and would therefore not result in disturbance of known hazardous materials or change the use, storage, or transport of hazardous materials associated with plant operation. Therefore, no new or more severe impacts related to hazardous materials beyond those identified in the EIR would occur. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Hydrology and Water Quality

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

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.2 of the Novato Sanitary District Wastewater Facility Plan Project EIR analyzed impacts to hydrology and water resources. The EIR identified significant impacts to surface and groundwater, including erosion and sedimentation, dewatering of shallow groundwater resources, localized flooding, and potential secondary effects to shallow wells. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore there would be no impact on existing drainage patterns, groundwater, or the ability to comply with regulatory permits, including National Pollutant Discharge Effluent Standards (NPDES), Clean Water Act Section 401 Water Quality certification, and Title 22. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Land Use, Planning, and Recreational Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
9. LAND USE AND LAND USE PLANNING— Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.5 of the Novato Sanitary District Wastewater Facility Plan Project EIR describes land uses and consistency with applicable plans and policies. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore the project would not physically divide an existing community or conflict with existing land uses. There are no applicable Habitat Conservation Plans (HCPs) or Natural Community Conservation Plans (NCCPs) in the WWTP area. The project would not conflict with plans and

policies identified in the Marin Countywide Plan or the City of Novato General Plan. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
10. MINERAL RESOURCES—Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

There are no known mineral resources in the project area; therefore there is no impact.

Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
11. NOISE—Would the project:				
a) Result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe noise impacts beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.8 of the Novato Sanitary District Wastewater Facility Plan Project

EIR analyzed noise impacts associated with project construction. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore the project would not contribute additional sources of excessive noise, generate groundborne vibration, or substantially increase ambient noise levels beyond the levels identified in the EIR. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Public Services and Utilities

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
13. PUBLIC SERVICES— Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.11 of the Novato Sanitary District Wastewater Facility Plan Project EIR analyzed public services and utilities impacts associated with construction at the Novato WWTP. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore, there would be no impact on existing police, fire, or emergency services, emergency response times, recreation and schools facilities. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Traffic and Circulation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
15. TRANSPORTATION AND TRAFFIC— Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

No Additional Impact. Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Section 3.9 of the Novato Sanitary District Wastewater Facility Plan Project EIR analyzed traffic impacts associated with project implementation on Davison Street, which provides access to the Novato WWTP. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities. Therefore, no new or substantially more severe impacts associated with the project would occur. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
16. UTILITIES AND SERVICE SYSTEMS—Would the project:				
a) Conflict with wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
c) Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Under the proposed project, procedures for maintenance and operation of the WWTP facilities will not change. Therefore, no new or more severe impacts beyond those identified in the Novato Sanitary District Wastewater Facility Plan Project EIR would occur. Potential conflict with wastewater treatment requirements, stormwater drainage capacity, and future WWTP treatment capacity were analyzed in the EIR. The proposed transfer of the operation, maintenance and management of the project facilities to a Contractor will not change the physical capacity, design, configuration, construction, or operation of the project facilities; therefore there are no additional impacts to utilities and service systems. In addition, the mitigation measures identified in the EIR and adopted by the District will continue to apply.

Mandatory Findings of Significance

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
17. MANDATORY FINDINGS OF SIGNIFICANCE—Would the project:				
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

On the basis of the evaluation presented above, the proposed project changes would not trigger any of the conditions requiring preparation of a subsequent of supplemental EIR. The proposed project change does not constitute a physical or operational change that would have significant environmental effects, or cumulatively considerable environmental effects, above and beyond those analyzed in the Wastewater Facility Plan Project EIR.

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