

November 1, 2011

Mayor Kellner and City Councilmembers
Novato City Council
75 Rowland Way
Novato, CA 94945



Re: Hanna Ranch Final Environmental Impact Report

Dear Mayor Kellner and City Councilmembers:

The Marin Conservation League has reviewed the FEIR for the Hanna Ranch project. Although the report has met the minimal standards for response to comments and recommended modifications of the project, it did not meet our expectations. Issues which we feel were inadequately addressed include:

- 1.) Failure to adapt the project to the setbacks required by the City of Novato or the Marin County Flood Control and Water Conservation District. The response that the MCFC&WCD could refuse the proposed use on their property was not a conciliatory response. The FEIR holds the singularly held interpretation of "top of bank" to mean "water's edge".
- 2.) The FEIR identifies 7 studies or plans that should be completed before a project is built. It does not, however, suggest or require that these essential studies be provided for public review or comment. If no public review is provided, the studies should be incorporated into the EIR.
- 3.) Mitigation for native and non-native trees is inadequate. 57 trees are to be removed, 43 of which are non-native. At least 22 native trees will be planted for the non-native trees removed. 42 native trees will be planted for the 14 native trees to be removed (City required 3:1 replacement). Therefore the environment will gain 7 trees to replace the large, mature trees to be removed.
- 4.) Elsewhere in the EIR (GCC 1) there is reference to planting over 200 trees for carbon sequestration. No mention is made of where these trees are to be planted, what kind of trees they should be, when they should be planted or what size they should be. This is a very vague mitigation.
- 5.) To address wildlife corridors to be lost because of the traffic generated by the project, a culvert is proposed from the Bev Ehreth Ecological Reserve to the small pond onsite. MCFC&WCD suggested daylighting the piping between the two ponds to create a creek. This would provide a wildlife corridor AND mitigate the small seasonal wetlands that will be lost. We support this concept of onsite mitigation and a natural wildlife corridor.
- 6.) The FEIR identifies the need for removal of invasive vegetation, but allows for "replanting or natural colonization of native plants". Disturbed land in this area usually colonizes with invasive species. Any disturbed soils should be planted with native species as soon as possible. Ongoing monitoring for recurring invasives should be carried out as the FEIR requires.

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7.) The FEIR dismisses potential future connection with Highway 37 and refused to discuss potential benefits or problems with it. This is a big issue for this site and for Vintage Oaks.

8.) The most environmentally sensitive alternative, other than No Project, is the Reduced Project. That alternative provides much more flexibility for dealing with the very tight entrance to the project and mitigating the project impacts on the two ponds on the site.

The City Council may feel this document fulfills the statutory requirements for environmental review, but accepting it will put more responsibility on your shoulders to do more careful analysis of each element of subsequent review. We hope you take on this responsibility thoughtfully.

Thank you for this opportunity to comment.

Yours truly,



Susan Stompe
President