

Mr. Dan Dawson, Chair
Novato Planning Commission
City of Novato
75 Rowland Way
Novato, CA 94945



August 16, 2010

Re: Scoping issues for Hanna Ranch

Dear Chairman Dawson and Commissioners:

The Marin Conservation League has monitored development in Marin County for 76 years and has established a number of principles for protecting the environment and minimizing the impacts of projects. We are pleased that an Environmental Impact Report is being done for the development at Hanna Ranch and have the following suggestions for analysis:

Circulation: The original FEIR for what is now Vintage Oaks encompassed the entire parcel from the south side of the Hanna Ranch hill to Novato Creek where it flows under Highway 101. That EIR projected traffic volumes for retail uses exceeding the capacity of the 101/Rowland interchanges and recommended an additional access to Highway 37. This EIR should:

- Evaluate the cumulative effects of traffic generated by the new uses at the Hanna Ranch combined with Vintage Oaks, and suggest mitigation.
- Evaluate the impact of the added traffic on public access to the hospital.
- Suggest emergency access alternatives for the new development.

Noise: The noise levels from Highway 101 are high and MCL discourages the use of sound walls where possible.

- How compatible are the current noise contours with the proposed uses' projected noise contours? What standard for setbacks will be required and what mitigation would be necessary?
- Would the proposed uses generate enough traffic to create onsite noise impacts?
- Would the levels of new traffic plus those of Vintage Oaks create cumulative noise impacts?

Air Quality: Traffic frequently backs up northbound on highway 101 at this area.

- How will the added traffic impact air quality?
- What mitigation can be proposed to keep air quality at acceptable levels?

Environmental Quality: The project is situated near sensitive wetlands in an area prone to flooding and the site contains a number of trees.

- An accurate tree count should be provided that includes trunk size and species.

Mitigation for trees to be removed should be onsite and at a replacement level to assure a long term benefit. Replacement trees should be of species native to this area. Trees could also be used to offset the air quality impacts of the added traffic.

- Any development near the wetlands should be setback to the city standard of 50' from top of the bank.
- To reduce bird strikes, utilities should be under ground.
- A hydrology analysis should be performed and mitigation created to keep urban pollutants from the ponds and wetlands.
- Will the panhandle be at an elevation to avoid flooding at heavy rain periods?

Green Building: Green building standards need to be the norm for new County developments.

- The new buildings should be built using the highest LEED building standards.
- Roof top solar energy arrays, green building materials, and "purple piping" for eventual availability of reclaimed wastewater should be incorporated.
- Water conservation is very important and a "no net increase for new projects" has been included in the new countywide plan. How will this project achieve no net increase in water demand?

Aesthetic Impacts: Aesthetic impacts of the development should include:

- Detailed and accurate visual simulations (photomontage) of proposed structures, landscaping, and other development components, taken from several vantage points.
- To avoid the kind of light pollution over parking areas such as that at the recently-developed Hamilton Marketplace, the project's proposed lighting plans, such as for parking, should be thoroughly described and mitigated.

Thank you for the opportunity to address the issues to be analyzed in the EIR. We look forward to reviewing the draft document. If you have additional questions, please contact Susan Stompe, 415-897-1610.

Yours truly,



Nona Dennis
President