

**Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58**

Project Information

Project Name: USCG-Pt-Reyes-Affordable-Housing

HEROS Number: 900000010466429

Start Date: 04/23/2025

Responsible Entity (RE): MARIN COUNTY, CIVIC CENTER SAN RAFAEL CA, 94903

RE Preparer: Tamara Taylor

State / Local Identifier:

Certifying Officer: Derek Johnson

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): Panorama Environmental, Inc.

Point of Contact: Susanne Heim

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: 100 Commodore Webster Dr, Point Reyes Station, CA 94956

Additional Location Information:

The project site is located at 100 Commodore Webster Drive in the Point Reyes Station community within unincorporated Marin County. The project site consists of 33.59 acres under assessor parcel numbers 119-240-73 and 119-236-10, and is located at the eastern limits of Point Reyes Station. The project site is bounded by the Point Reyes Affordable Homes complex to the west, an undeveloped lot to the north, and Lagunitas Creek to the east and south.

Direct Comments to:

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Community Land Trust Association of West Marin (CLAM) and Eden Housing, Inc. (Eden), referred to jointly as "Applicant" have filed an application with Marin County for a Coastal Permit and Conditional Use Permit to adaptively reuse and repurpose the former United States Coast Guard (USCG) site to provide affordable housing units in Point Reyes Station. The Point Reyes Station USCG Coastal Permit and Conditional Use Permit (Project) would: * Rehabilitate existing townhomes contained in 10 two-story buildings (Buildings 101, 102, 103, 104, 201, 202, 203, 204, 205, 206) to provide 36 affordable housing units; * Rehabilitate and repurpose the existing "barracks" building (Building 50) to provide 15 affordable housing units; * Rehabilitate "Building 100A" to provide three affordable housing units; * Demolish existing storage building (Building 100B) and replace with landscaping and a patio area; * Repurpose existing mechanical shop and maintenance area (Building 100C) as a workshop and storage area; * Renovate and expand an existing kitchen/galley building (Building 1) to provide a resident services building including community space for the development; * Construct a new on-site wastewater treatment system; * Remove non-residential structures and provide bioretention facilities in environmentally sensitive habitat areas (ESHA); * Remove trees from a riparian area; and * Reconstruct an existing playground. An Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the Project pursuant to the California Environmental Quality Act (CEQA) of 1970 (as amended), the CEQA Guidelines (14 California Code of Regulations [CCR] s.s. 15000 et seq.), and the Marin County Environmental Impact Review Guidelines. Mitigation measures have been developed for the Project and are summarized in the Mitigation Monitoring and Reporting Plan which is included as Appendix I of the IS/MND (1).

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose of the Project is to adaptively reuse and repurpose the former USCG site to provide affordable housing units in Point Reyes Station. The Project would provide

affordable housing to low-income individuals and families while furthering the goal of repurposing the currently closed USCG station site, which previously served as housing accommodations for the former USCG service members and employees.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The Project site was developed by the USCG in 1974 for use as USCG housing and support services. The Project site development currently consists of 11 residential buildings, containing 36 townhome units and 21 congregate residential rooms and 6 non-residential structures. The existing residential buildings have not been occupied since the County of Marin purchased the property in 2019. The Project site also contains recreational facilities including a playground area, tennis court, basketball court, and aboveground pool and spa. The North Marin Water District (NMWD) maintains two existing potable water wells and an associated treatment facility on the project site. Below-ground tanks for limited onsite sewage collection and storage are also located within the Project site. After the property transferred ownership from the USCG to Marin County, the site was used by local fire departments for training and wildfire emergency staging and some of the office space was temporarily used by the County Parks Department.

Maps, photographs, and other documentation of project location and description:

[8.jpg](#)

[7.jpg](#)

[6.jpg](#)

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[Site Inspection Form_USCG Housing.pdf](#)

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:

**7015.15 certified by Certifying Officer
on:**

**7015.16 certified by Authorizing Officer
on:**

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-23-UC-06-0004	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$148,291.00
M-21-UP-06-0206	Community Planning and Development (CPD)	HOME Program	\$1,000,000.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$1,148,291.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$1,148,291.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The proposed Project is not located within an airport land use plan or within 2,500 feet (0.5 miles) 2 miles of a public airport or public use airport. The closest airport is the Marin County (Gross Field) Airport, approximately 14 miles east of the Project site (2). The Project site is not within 15,000 feet (3 miles) of a military airport (3).
Coastal Barrier Resources Act Coastal Barrier Resources Act, as	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore,

<p>amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>		<p>this project is in compliance with the Coastal Barrier Resources Act.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements. A portion of the Project site, west of Lagunitas Creek, is located within the 100-year floodplain. The existing and proposed habitable structures are located outside of the mapped National Flood Insurance Program or Special Flood Hazard Area as amended by Federal Emergency Management Agency (FEMA) on May 5, 2023, in the Letter of Map Amendment. In April 2025, the Project site was re-parceled and divided into three parcels: Parcel A, B, and C. Parcel A, which includes the housing is located outside the mapped floodway. Only bioretention facilities and landscaping would occur within the floodway (Parcel C);therefore, the Federal mandatory flood insurance requirement does not apply</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project's county or air quality management district is in non-attainment status for the following: Ozone, Particulate Matter, <2.5 microns. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The</p>

		<p>project is in compliance with the Clean Air Act. The Clean Air Act's General Conformity Rule requires federal actions to comply with Environmental Protection Agency's (EPA) National Ambient Air Quality Standards (NAAQS) by ensuring they do not interfere with a State or Tribe's air quality goals. Projects must conform to the State Implementation Plan, which is met if total emissions remain below thresholds set by the Bay Area Air Quality Management District (BAAQMD). The Project is located within the San Francisco Bay Area Air Basin, which is within BAAQMD. The EPA Greenbook indicates Marin County is currently in nonattainment for 8-hour ozone and PM-2.5 (7). All construction-related emissions would be below the BAAQMD significance thresholds (1). The Project is not near any industrial facilities that would generate toxic air contaminants or diesel particulate matter. Additionally, the Project site is in an area of low exposure to pollutants including ozone, pm2.5, and diesel particulate matter (8,9). To ensure air quality impacts are less than significant even when Project construction emissions are below the numeric significant thresholds, basic construction mitigation measures will be implemented. The Project would also implement dust control measures during ground disturbance, consistent with the Marin Development Code section 22.20.040.C (1).</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program. The project is in compliance with the Coastal Zone Management Act. Moreover, the project was granted a Coastal Development Permit by the County of</p>

		Marin acting on behalf of the California Coastal Commission on September 29, 2024. No challenges or appeals were filed on the project approvals.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is exempt from radon consideration. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements. The Phase 1 ESA identified the Chevron Bulk Plant (11095 State Route 1), located about 143 feet west-southwest and downgradient of the Project site. It was subject to cleanup, and the case was closed with no violations or residual concerns as of 2012. No surrounding facilities with active aboveground hazardous storage or bulk flammable material handling were found within one mile of the Project site (12).
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. The

		<p>Project site contains existing housing structures and does not support agriculture uses. The Natural Resources Conservation Service Web Soil Survey indicates the Project area contains soils of Statewide Importance (soil types 148, 114, and 105) (17). The Farmland Mapping and Monitoring Program of the California Department of Conservation, California Important Farmland Finder indicates the Project site primarily contains Urban and Built Up Land and Other Land; however, a small area in the northeast portion of the Project site contains Farmland of Local Importance (18). Environmental review under CEQA Farmland of Local Importance is not considered agricultural land (18,19). Additionally, no development would occur in this portion of the Project site. No impact on farmland, agricultural zoning, or a Williamson Act contract would occur.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. A portion of the Project site, west of Lagunitas Creek, is located within the 100-year floodplain. The existing and proposed habitable structures are located outside of the mapped floodway as amended by FEMA on May 5, 2023, in the Letter of Map Amendment (6). Because the Project site parcel was still within the floodplain, in April 2025, the Project site was re-parceled and divided into three parcels: Parcel A, B, and C. Parcel A, which includes the housing located outside the mapped floodway. Only the proposed bioretention facilities and landscaping would occur within the floodway (Parcel C). No development would occur within Parcel B (5). A portion of the Project site, west of Lagunitas Creek, is located within the</p>

		<p>100-year floodplain. The existing and proposed habitable structures are located outside of the mapped National Flood Insurance Program or Special Flood Hazard Area as amended by Federal Emergency Management Agency (FEMA) on May 5, 2023, in the Letter of Map Amendment. In April 2025, the Project site was re-parceled and divided into three parcels: Parcel A, B, and C. Parcel A, which includes the housing is located outside the mapped floodway. Only bioretention facilities and landscaping would occur within the floodway (Parcel C); therefore, the Federal mandatory flood insurance requirement does not apply (5,6).</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Based on Section 106 consultation, there are No Historic Properties Affected because the project will have no effect on the historic properties that are present. The project is in compliance with Section 106. An Archeological Study, dated October 2023, was conducted for the Project which included Tribal outreach to Federated Indians of Graton Rancheria. One National Register of Historic Places (NRHP)/ California Register of Historical Resources (CRHR) potentially eligible resource is located on the Project site. This resource would be avoided by the Project; therefore, it would not be impacted by the Project. The Project site is not within the viewshed of a historic district (20). Mitigation Measure CUL-1 would require preparation of an Archeological Monitoring Plan and archeological monitoring to be implemented during construction to protect potential historic and prehistorical resources which may be exposed during construction. A State Office of Historic Preservation (SHPO) consultation letter was sent on June 6, 2025, requesting concurrence with the</p>

		<p>findings regarding the historical resources that will be avoided on the site. Concurrence with the findings was granted because no response was received from SHPO during the 30 consultation period, per 36 CFR Part 800.3(c)(4) Failure of the SHPO/THPO to respond.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>A Noise Assessment was conducted. The noise level was acceptable: 45.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. The Project site is not within 3,000 feet of a railroad, 15 miles of a military or Federal Aviation Administration civil airfield, or a major roadway (2). The on-site water treatment system would include pumps, aeration blowers, and a backup emergency generator to ensure consistent power supply during periodic power outages. The emergency generator is located approximately 150 feet from the nearest residential receptor. Although the emergency generator would only be used sporadically in the case of emergencies causing power outages (e.g., storm events), the noise from operation of the wastewater treatment equipment has the potential to exceed HUD day night average interior noise standard of 45 dB Leq at the nearest residential property. Mitigation Measure NOI-1 specifies standards for the wastewater treatment plant design to reduce noise to a less than significant level. Additionally, a Noise Mitigation Plan would be developed for the Project and submitted to the County prior to construction of the wastewater treatment system (1).</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in</p>

		compliance with Sole Source Aquifer requirements. The Project is not located on a sole source aquifer, therefore the Project would have no impact on sole source aquifers (21).
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. The USFWS National Wetlands Inventory indicates a portion of the Project site is within a freshwater forested/shrub wetland (PFO1A), and fresh water emergent wetland (PEM1A) (22). The LCP requires a 50-foot buffer on the edge of riparian vegetation associated with a coastal stream; therefore, the Project would not involve construction activities or facilities within the 50-foot riparian buffer which includes wetlands (1).
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The Project site is in the Coastal Zone and is subject to the Marin County LCP. The LCP contains several policies that were adopted to avoid or mitigate environmental effects. The Project would be consistent with all relevant LCP policies adopted for the purpose of avoiding or mitigating environmental effects. The Project is consistent with the Marin Countywide Plan and LCP requirements per Resolution No. 24-106, A Resolution Approving the County of Marin Coastal Development Permit and Conditional Use Permit. Under Resolution No. 106, the Marin County Deputy Zoning Administrator grants approval to proceed with the Project and confirms that it meets land use and Marin County environmental compliance standards (11).	Coastal Development Permit
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	3	Analysis in the geotechnical investigation determined that the potential for liquefaction and ground failures associated with liquefaction, including lateral spreading, to occur at the site during a seismic event is low due to the high relative density and/or cohesion of the soil below the design groundwater level. The Project area is relatively flat (2 to 7 percent) and not	SWPPP, BMPs Construction General Permit, construction of bioretention facilities.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>prone to landslides. Most of the Project facilities are located within existing developed areas, and disturbance to topsoil would be limited. The Stormwater Pollution Prevention Plan (SWPPP) would include erosion control measures that protect exposed slopes and drainage inlets. The SWPPP would contain soil stabilization and sediment control BMPs required to be implemented during construction. The new bioretention areas within the Project site and additional trees and vegetation planted on the Project site would provide long-term soil and erosion control on the site. The drainage patterns on the Project site would remain, and all areas of the Project would continue to drain towards Lagunitas Creek. Some grading would be required on the site to intercept the stormwater runoff and direct it to bioretention areas before the water reaches Lagunitas Creek. While the stormwater runoff would be redirected to the bioretention areas, the bioretention areas would not increase erosion or siltation on or off site as the purpose of the bioretention features is to reduce siltation (1).</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	<p>Hazards and Hazardous Wastes The 2025 Phase I ESA determined the presence of lead-based paint and ACM on-site. Mitigation Measures Haz-1 outlines the procedures to be implemented to properly test and dispose of potential lead-based paint and ACM during demolition and construction (1,12). A review of the NEPAssist tool indicates one hazardous waste generator owned by the U.S. Coast Guard CAMSPAC is within the Project site. The site has no violations (2). Site Safety Project operation would not interfere with emergency response because driveways and access points would comply with all County fire safety standards to maximize entry and egress space for emergency vehicles. In the event of an emergency, evacuation from the Project site would be provided by Mesa Road, immediately east of the intersection of Mesa Road and California State Route 1. Occupancy of the low-density residential parcels would not block or impede access to primary evacuation route, Point Reyes-Petaluma Road (1)</p>	<p>Mitigation Measure NOI-1 specifies standards for the wastewater treatment plant design and emergency generator to reduce noise to a less than significant level (1). Mitigation Measures Haz-1 outlines the procedures to be implemented to properly test and dispose of potential lead-based paint and ACM during demolition and construction (1,12).</p>
SOCIOECONOMIC			
Employment and Income Patterns	2	Data USA reports the average median household income in Point Reyes Station was	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>\$60,714 in 2022 and approximately 57 percent of residents are employed. The median property value was \$1.72 million in 2023 (24). The housing units on the Project site are currently unoccupied, and the Project would allow for conversion of the property to affordable housing units. The Project would not alter employment and income patterns in the area.</p>	
Demographic Character Changes / Displacement	1	<p>The Project would reuse and repurpose the former USCG site to provide affordable housing in Reyes Station and would consist of 54 housing units (1). The Project would not result in the displacement of residents or a change in the character of the area</p>	
Environmental Justice EA Factor		N/A	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	<p>The West Marin/Inverness Elementary School and the Point Reyes Presbyterian church are under a one mile radius of the Project site. There are no NRHP sites near the Project site (2). The Project would provide affordable housing units near educational and cultural facilities in Point Reyes Station. The Project is expected to have a positive impact on low-income residents.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Commercial Facilities (Access and Proximity)	2	The area surrounding the Project site is generally zoned as village commercial residential, residential agricultural, and multiple planned residential (1,10). Commercial facilities under a one-mile radius of the Project site include several restaurants and cafes, a hardware store, a hotel, and other local businesses. No impacts on commercial facilities are anticipated, although low-income residents in the affordable housing units may be closer to commercial facilities in Point Reyes Station.	
Health Care / Social Services (Access and Capacity)	2	Medical facilities including the West Marin Medical Center, West Marin Health and Human Services, Coastal Health Alliance, and Point Reyes Health Center are under a mile from the Project site. The Project would provide affordable housing units which may be accessed by residents. The Project is expected to have a positive impact on low-income residents due to the proximity to health care and social services in Point Reyes Station. The additional 54 units are not expected to increase the demand for existing health services in Point Reyes Station.	
Solid Waste Disposal and	2	Recology Sonoma Marin provides waste services to	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Recycling (Feasibility and Capacity)		<p>Point Reyes Station. The nearest landfill is the Waste Management Redwood Landfill, located approximately 3.5 miles east of the Project site. The Redwood Landfill is permitted to accept 2,310 tons of material daily (25). Project construction would reuse excavated soils on site, with a small volume of net import of fill material. Construction of the Project would generate small volumes of construction waste (e.g., equipment packaging, trash generated by workers) and would not exceed the capacity of nearby landfills. During operations, it is expected the Project would produce approximately 1,440 pounds of waste per day. Occupancy of the low-density residential parcels would not generate enough waste to change capacity projections at the nearby landfills. Adequate capacity at the nearby landfills is available to accommodate the disposal of materials associated with the Project. Occupancy of the low-density residential parcels would not generate enough waste to change capacity projections at a landfill (1).</p>	
Waste Water and Sanitary Sewers	2	The Project would be served by a newly constructed	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
(Feasibility and Capacity)		wastewater treatment facility, subsurface drip irrigation system, and leach field. The wastewater treatment system would be on the southwest edge of the Project site, near the entrance on Commodore Webster Drive. The wastewater treatment system would consist of a Membrane Aerated Biofilm Reactor, which would be housed in a combination of underground tanks, and above ground container, treatment building and storage tank. The wastewater system would accommodate up to 10,000 gallons of wastewater per day, which is adequate to serve the demands of the Project (1).	
Water Supply (Feasibility and Capacity)	3	NMWD obtains water for the West Marin service area primarily from two wells located at Gallagher Ranch. Some water is also obtained from two wells at the Project site. The NMWD maintains the two active water supply wells within the Project site (26). The anticipated water demand for the Project is 9,500 gallons per day. The connection of the 54 housing units to the NMWD service system would not cause a significant impact on groundwater supplies due to the limited volume of water required for the Project, and	Mitigation Measure HYDRO-1 defines procedures for protection of water supply wells on the Project site. In addition, the Project would need to obtain a Construction Stormwater General

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>because the units were already connected to this water supply source and factored into the water supply program. Drinking water source Protection Zones are applied to groundwater resources to manage potential contamination. Treated wastewater would be applied to the Project's leach field when water cannot be applied for landscaping. The landscaping area and only a small portion of the leach field is within the Protection Zone for the two NMWD wells within the Project site.</p>	
Public Safety - Police, Fire and Emergency Medical	2	<p>The Project is not expected to induce population growth as the Project would create affordable housing in an area where the need outweighs the existing stock. Driveways and access points would comply with all County fire safety standards to maximize entry and egress space for emergency vehicles and would comply with all County fire safety standards to maximize entry and egress space for emergency vehicles. The Project is not expected to impact acceptable service ratios, response times or other performance objectives of public safety facilities or services (1)</p>	
Parks, Open Space and Recreation	2	<p>The Project could result in an incremental increase in the</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
(Access and Capacity)		use of parks in the area, but the amount of additional use would be negligible relative to the existing use of parks and other recreational facilities. This incremental increase in usage would not result in substantial physical deterioration of the facilities (1)	
Transportation and Accessibility (Access and Capacity)	2	The Project would provide 119 parking spaces, including eight Americans with Disabilities Act compliance spaces and 24 electric vehicle spaces as well as 62 long-term and 44 short-term bicycle parking spots (1). The closest bus route is the 68 Downtown San Raphael - Inverness to Pt. Reyes Downtown-Shoreline Highway and 3rd Street via Manor, Lagunitas, and Pt. Reyes (27). The proposed parking accessibility, electric vehicle parking, and bicycle parking would be consistent with County policies for the transit system and the Project would not conflict with programs or policies addressing the circulation system (1).	
NATURAL FEATURES			
Unique Natural Features /Water Resources	3	The Project would involve activities within the 50-foot riparian ESHA buffer to remove existing structures from the ESHA buffer and construct bioretention facilities. Implementation of	50 riparian buffer and no structures within the ESHA, implementation of BMPs and SWPPP and a Construction General Permit

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>erosion and sediment control BMPs in compliance with the specific SWPPP and Construction Stormwater General Permit would reduce impacts on riparian areas from grading nearby to a less than significant level. The Project would avoid construction within Lagunitas Creek (1).</p>	
<p>Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)</p>	<p>3</p>	<p>Vegetation Focused surveys conducted for the Project did not find any special-status plants within the Project site. Because no special-status plants occur in the area, the Project would have no impact on special-status plants. The Project would not involve any construction activities or facilities within riparian areas, purple needlegrass grassland ESHA, CCC seasonal wetland ESHA, Corps seasonal wetland ESHA, or California bay forest. The Project would not result in removal or direct impacts on any riparian area of sensitive natural community occurring on the Project site (1,13). Wildlife The threatened California red legged frog has the potential to occur in the Project area, however the Biological Opinion concluded that the Project is not likely to jeopardize the continued existence of the California red legged frog. The California freshwater shrimp has the</p>	<p>Mitigation Measures BIO-1 through BIO-15 have been identified to reduce impacts on fish and wildlife species to less-than-significant levels (1)</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>potential to occur within Lagunitas Creek within the Project area. Direct impacts to the California freshwater shrimp would be avoided and indirect water quality impacts are not anticipated with implementation of the SWPPP and water quality BMPs (1,14). The CCC coho salmon and CCC steelhead have the potential to occur in the Project area. However, NMFS informal consultation concluded that with implementation of avoidance and minimization measures outlined in the written concurrence letter impacts are expected to be insignificant (1,15) The Monarch butterfly proposed for listing as threatened has the potential to occur in the Project area however the Project area is not within proposed critical habitat for Monarch butterfly (16). Mitigation Measures BIO-1 through BIO-15 have been identified to reduce impacts on fish and wildlife species to less-than-significant levels (1)</p>	
Other Factors 1		<p>Marin County Open Space District (MCOSD) is the local government agency responsible for preserving public open space in Marin County. MCOSD, along with Marin County Parks, developed a Vegetation and Biodiversity Management</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Plan to guide management of the area. The Project is not located within any of the MCOSD preserves identified in the Vegetation and Biodiversity Management Plan (28).	
Other Factors 2	2		
CLIMATE AND ENERGY			
Climate Change		N/A	
Energy Efficiency	1	The Project would be all electric, provide 100 percent renewable energy, and would not include natural gas appliances or plumbing. The Project would include 558,000 kWh solar photovoltaic system, which would offset 100 percent of projected energy consumption (all electric residences, the resident services building, a wastewater treatment plant, and electric vehicle charging loads). While the Project would include a diesel backup generator, the generator would be used only in emergencies when there is no power from PG&E and the battery energy storage system is not sufficient. The Project also includes charging stations for electric vehicles. Project features would improve energy reliability and efficiency and impacts would be less than significant (1).	

Supporting documentation

[USCG Housing IS-MND MMRP Final.pdf](#)

[uscg-point-reyes-ismnd_draft_041524\(2\).pdf](#)

Additional Studies Performed:

* Initial Study/Mitigated Negative Declaration - Prepared by Panorama Environmental, 2024 (1) * CalEEMod - Prepared by Panorama Environmental, 2023 * Biological Assessment - Prepared by Panorama Environmental, Inc., 2023 (13) * Biological Site Assessment Report - Prepared by WRA Environmental Consultants, 2023 * Archeological Study - Prepared by Evans and DeShazo, 2023 (20) * Historic Resource Assessment - Prepared by Groundwork Planning & Preservation, 2023 * Phase I ESA - Prepared by Essel Environmental Engineering & Consulting, 2025 (12) * Geotechnical Investigation - Prepared by Rockridge Geotechnical, 2022 * Groundwater and Soils Investigation - Prepared by Questa Engineering Corp, 2022 * Stormwater Control Plan - Prepared by Sherwood Design Engineers, 2023 * Basis of Design Report - Prepared by Sherwood Design Engineers, 2022 * Environmental Compliance Due Diligence Activities Report - Prepared by Tetra Tech, 2016

[2024-0014873-S7 Marin County USCG Point Reyes Housing Project\(1\).pdf](#)
[USCG_Point Reyes_BA_Nov2023\(1\).pdf](#)
[uscg-point-reyes-ismnd_draft_041524\(3\).pdf](#)

Field Inspection [Optional]: Date and completed

by:

Sarah Allen

7/24/2025 12:00:00 AM

[8.jpg](#)

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[Site Inspection Form_USCG Housing.pdf](#)

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

* BAAQMD * California Air Resources Board * California Department of Conservation - California Important Farmland Map * California Department of Fish and Wildlife * California Department of Forestry and Fire Protection * California Department of Parks and Recreation * California Department of Water Resources * California Energy Commission * California Environmental Protection Agency * California State Water Resources Control Board * California Water Resources Control Board * California Department of Transportation * Marin County * FEMA * Federal Transit Administration * Office Historic Preservation * Natural Resources

Conservation Service * United States Geological Survey * U.S. Environmental
Protection Agency * U.S. Fish and Wildlife Service

List of Permits Obtained:

Permit Agency Function National Environmental Policy Act Housing and Urban
Development Required prior to authorization of federal funding Section 7
Consultation and Biological Opinion U.S. Fish and Wildlife Service Potential to affect
California red-legged frog Section 7 Interagency Cooperation Concurrence Letter and
Magnuson-Stevens Fishery Conservation and Management Act National Marine
Fisheries Service Potential to effect CCC coho salmon and CCC steelhead Section 106
Consultation State Historic Preservation Officer Concurrence of determination of
effect on historic properties Coastal Development Permit Marin County Development
of housing units and major vegetation removal within ESHA Report of Waste
Discharge and Form 200 and a Title 22 Engineering Report San Francisco Bay Regional
Water Quality Control Board Wastewater treatment system Construction
Stormwater General Permit State Water Resources Control Board Disturbance of
more than 1 acre of land Conditional Use Permit Marin County Development of
affordable housing Building Permit Marin County Rehabilitation and demolition of
existing buildings and structures

Public Outreach [24 CFR 58.43]:

An early floodplain notice was published on May 8, 2025. The comment period ended
on May 27, 2025, and no comments were received. The CEQA Guidelines sections
15073 and 15105(b) require that the lead agency designate a period during the CEQA
process when the public and other agencies can provide comments on the potential
impacts of the Project. Accordingly, the County circulated the IS/MND for a 30-day
public and agency review period from April 22, 2024, to May 22, 2024. Notices were
sent to 276 people. The County of Marin Community Development Agency received
102 comment letters on the Draft IS/MND during the public comment period. All
public comments were responded to in the Final IS/MND published in August 2024

Cumulative Impact Analysis [24 CFR 58.32]:

The Project could have a cumulatively considerable impact on air quality if it either 1)
resulted in emissions above the significance thresholds or 2) violated any action in an
attainment plan. BAAQMD thresholds for ozone precursor pollutants (ROGs and NOX)
and particulate matter (PM10 and PM2.5) are the thresholds at which a Project would
be considered to constitute a cumulatively considerable net increase of any criteria
pollutant for which the region is non-attainment. Marin County is within the San

Francisco Bay Area Air Basin. The Project would be consistent with all applicable air quality control measures contained in the Bay Area Clean Air Plan, and the Project would not conflict with or obstruct implementation of the plan. The average daily construction and operational emissions are below BAAQMD's significance thresholds. Because the Project would not exceed any thresholds established for evaluating cumulative impacts on air quality, the Project's contribution to cumulative air quality impacts would be less than significant. The Project could result in localized temporary construction impacts on special status species and migratory birds. Mitigation measures would be implemented to reduce the impacts on special status species so that the localized and temporary impacts of construction would not result in a cumulatively considerable impact on any special status species, and the cumulative impact would be less than significant with the Project mitigation included. The Project's potential impacts on groundwater supply are specific to the Project and not a cumulative impact. Impacts from sedimentation in Lagunitas Creek is a cumulative impact that is addressed through the total maximum daily load (TMDL). The Project would not conflict with implementation of the TMDL, and the Project construction would include implementation of BMPs consistent with the Construction Stormwater General Permit. With the implementation of stormwater and erosion control BMPs and installation of the bioretention basins for long-term stormwater management, the Project's contribution to a cumulatively significant impact on sedimentation in Lagunitas Creek would be less than significant. No similar Projects are proposed in the Project vicinity. While the Project would reintroduce residents to the Project area, the additional residents would not create a significant cumulative impact on public services as no other Projects are proposed in the area that would contribute to a cumulative impact on public services or utilities and service systems.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Consideration of an alternative site is not warranted because a key component of the Project is to repurpose and rehabilitate the closed USCG station to provide affordable housing in Point Reyes Station. There are no other local housing sites that are not currently being used and proximal to services and facilities downtown. No other alternative sites have been identified that would be compatible for the proposed development objectives within the community. Reuse of this site is expected to have positive impacts on the surrounding community

No Action Alternative [24 CFR 58.40(e)]

The no-action alternative would mean continued vacancy of the Project site, which is already developed with pre-existing housing. Affordable residential units would not be added to Point Reyes Station.

Summary of Findings and Conclusions:

The County of Marin has determined that the Project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act (NEPA) of 1969 is not required. The project will have beneficial impacts in that it will provide affordable housing to locals who would otherwise need to commute long distances to live and work in the Point Reyes community. Any negative impacts associated with the project have all been mitigated to less than significant, and a mitigation monitoring and reporting program was adopted as part of the project entitlements.

Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Endangered Species Act	Mitigation Measure BIO 1 Tree Removal Outside of Monarch Butterfly Roosting Season Mitigation Measure BIO 2 Worker Environmental Awareness Training Mitigation Measure BIO 3 Install Exclusion Fencing Mitigation Measure BIO 4 Designated Biologist Mitigation Measure BIO 5 Designated Biologist Authority Mitigation Measure BIO 6 On-site Construction Monitoring Mitigation Measure BIO-7: California Red-legged Frog Pre-construction Survey Mitigation Measure BIO-8: Timing Construction Commencement to Avoid California Red-legged Frog Mitigation Measure BIO-9: Avoid Construction During Rain Events Mitigation Measure BIO-10: Cover Trenches	N/A		

	<p>Mitigation Measure BIO-11: Erosion Control Material</p> <p>Mitigation Measure BIO-12: Waste Management</p> <p>Mitigation Measure BIO-13: Procedures for Encounters with California Red-legged Frog</p> <p>Mitigation Measure BIO-14: Avoidance of Nesting Birds</p>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	Coastal Development Permit	N/A		
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	SWPPP, BMPs Construction General Permit, construction of bioretention facilities.	N/A		
Hazards and Nuisances including Site Safety and Site-Generated Noise	Mitigation Measure NOI-1 specifies standards for the wastewater treatment plant design and emergency generator to reduce noise to a less than significant level (1). Mitigation Measures Haz-1 outlines the procedures to be implemented to properly test and dispose of potential lead-based paint and ACM during demolition and construction (1,12).	N/A		
Water Supply (Feasibility and Capacity)	Mitigation Measure HYDRO-1 defines procedures for protection of water supply wells on the Project site. In addition, the Project would need to obtain a Construction Stormwater General	N/A		
Unique Natural Features	50 riparian buffer and no structures within the ESHA, implementation of BMPs and	N/A		

/Water Resources	SWPPP and a Construction General Permit			
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	Mitigation Measures BIO-1 through BIO-15 have been identified to reduce impacts on fish and wildlife species to less-than-significant levels (1)	N/A		

Project Mitigation Plan

Mitigation measures were determined via various permits and through the IS/MND CEQA process by the Marin County Planning Department who, and its contractors are responsible for implementing mitigation measures, as described in the IS/MND and MMRP, and permits.

[com-24-106-approved-resolution\(1\).pdf](#)

[USCG Housing IS-MND_MMRP_Final\(1\).pdf](#)

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The proposed Project is not located within an airport land use plan or within 2,500 feet (0.5 miles) 2 miles of a public airport or public use airport. The closest airport is the Marin County (Gross Field) Airport, approximately 14 miles east of the Project site (2). The Project site is not within 15,000 feet (3 miles) of a military airport (3).

Supporting documentation

[Pt Reyes Airports.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

- ✓ No. This project does not require flood insurance or is excepted from flood insurance.

Based on the response, the review is in compliance with this section.

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

- ✓ No

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements. A portion of the Project site, west of Lagunitas Creek, is located within the 100-year floodplain. The existing and proposed habitable structures are located outside of the mapped National Flood Insurance Program or Special Flood Hazard Area as amended by Federal Emergency Management Agency (FEMA) on May 5, 2023, in the Letter of Map Amendment. In April 2025, the Project site was re-parceled and divided into three parcels: Parcel A, B, and C. Parcel A, which includes the housing is located outside the mapped floodway. Only bioretention

facilities and landscaping would occur within the floodway (Parcel C);therefore, the Federal mandatory flood insurance requirement does not apply

Supporting documentation

[Exhibit A Attach 3c County of Marin P3710 PLAN SET 3.pdf](#)

[Exhibit A Attach 3b County of Marin P3710 PLAN SET 2.pdf](#)

[PM2025 042\(2\).pdf](#)

[PM2025 042 2.pdf](#)

[PM2025 042 1.pdf](#)

[FEMA LOMA Approved 2023.pdf](#)

[Exhibit A Attach 3a County of Marin P3710 PLAN SET 1.pdf](#)

[Recorder Disclaimer.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes

No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

No, project's county or air quality management district is in attainment status for all criteria pollutants.

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

- ✓ Ozone
- ✓ Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Ozone ppb (parts per million)
 Particulate Matter, <2.5 microns µg/m3 (micrograms per cubic meter of air)

Provide your source used to determine levels here:

https://www3.epa.gov/airquality/greenbook/anayo_ca.html
<https://www.marincounty.gov/departments/cda/planning/environmental-planning/current-ceqa-projects/pt-reyes-station-uscg-affordable-housing-project>

4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

- ✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Ozone	4.18	ppb (parts per million)
Particulate Matter, <2.5 microns	0.89	µg/m3 (micrograms per cubic meter of air)

Based on the response, the review is in compliance with this section.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

The project's county or air quality management district is in non-attainment status for the following: Ozone, Particulate Matter, <2.5 microns. This project does not exceed

de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. The Clean Air Act's General Conformity Rule requires federal actions to comply with Environmental Protection Agency's (EPA) National Ambient Air Quality Standards (NAAQS) by ensuring they do not interfere with a State or Tribe's air quality goals. Projects must conform to the State Implementation Plan, which is met if total emissions remain below thresholds set by the Bay Area Air Quality Management District (BAAQMD). The Project is located within the San Francisco Bay Area Air Basin, which is within BAAQMD. The EPA Greenbook indicates Marin County is currently in nonattainment for 8-hour ozone and PM-2.5 (7). All construction-related emissions would be below the BAAQMD significance thresholds (1). The Project is not near any industrial facilities that would generate toxic air contaminants or diesel particulate matter. Additionally, the Project site is in an area of low exposure to pollutants including ozone, pm2.5, and diesel particulate matter (8,9). To ensure air quality impacts are less than significant even when Project construction emissions are below the numeric significant thresholds, basic construction mitigation measures will be implemented. The Project would also implement dust control measures during ground disturbance, consistent with the Marin Development Code section 22.20.040.C (1).

Supporting documentation

[uscg-point-reyes-ismnd_draft_041524.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes

No

2. Does this project include new construction, conversion, major rehabilitation, or substantial improvement activities?

Yes

No

3. Has this project been determined to be consistent with the State Coastal Management Program?

Yes, without mitigation

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes, with mitigation

No, project must be canceled.

Screen Summary

Compliance Determination

This project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program. The project is in compliance with the Coastal Zone Management Act. Moreover, the project was granted a Coastal Development Permit by the County of Marin acting on behalf of the California Coastal Commission on September 29, 2024. No challenges or appeals were filed on the project approvals.

Supporting documentation

[com-24-106-approved-resolution.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

1. How was site contamination evaluated?* Select all that apply.

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening.
- None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

✓ No

Explain:

A Phase 1 Environmental Site Assessment (Phase 1 ESA) was completed on April 1, 2025, for the Project site to identify recognized environmental conditions. The Phase 1 ESA found no evidence of vapor encroachment conditions including underground storage tanks containing volatile chemicals (such as gasoline) present on site. No known contaminant plumes were identified in the groundwater beneath the site or within 100 feet of the site. It was determined lead-based paint and asbestos containing materials (ACM) are present on-site (12). The Project includes Mitigation Measure Haz-1 which outlines the procedures to be implemented to properly test and dispose of potential lead-based paint and ACM during demolition and construction (1).

Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's Enviromapper, NEPAAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

✓ Yes

Explain:

Radon testing will be conducted prior to construction of the project

No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.

- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is exempt from radon consideration. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[Phase I ESA.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

- ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

2. Are federally listed species or designated critical habitats present in the action area?

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

- ✓ Yes, there are federally listed species or designated critical habitats present in the action area.

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat. in the action area.

- ✓ May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

4. Informal Consultation is required

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?

- ✓ Yes, the Service(s) concurred with the finding.

Based on the response, the review is in compliance with this section. Document and upload the following below:

- (1) A biological evaluation or equivalent document
- (2) Concurrence(s) from FWS and/or NMFS
- (3) Any other documentation of informal consultation

Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.

No, the Service(s) did not concur with the finding.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

✓ Mitigation as follows will be implemented:

Mitigation Measure BIO 1 Tree Removal Outside of Monarch
Butterfly Roosting Season Mitigation Measure BIO 2 Worker
Environmental Awareness Training Mitigation Measure BIO 3
Install Exclusion Fencing Mitigation Measure BIO 4
Designated Biologist Mitigation Measure BIO 5 Designated
Biologist Authority Mitigation Measure BIO 6 On-site
Construction Monitoring Mitigation Measure BIO-7:
California Red-legged Frog Pre-construction Survey
Mitigation Measure BIO-8: Timing Construction
Commencement to Avoid California Red-legged Frog
Mitigation Measure BIO-9: Avoid Construction During Rain
Events Mitigation Measure BIO-10: Cover Trenches
Mitigation Measure BIO-11: Erosion Control Material
Mitigation Measure BIO-12: Waste Management Mitigation
Measure BIO-13: Procedures for Encounters with California
Red-legged Frog Mitigation Measure BIO-14: Avoidance of
Nesting Birds

No mitigation is necessary.

Screen Summary

Compliance Determination

This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.

Supporting documentation

[USCG_Point Reyes_BA_Nov2023.pdf](#)

[NFMS Point Reyes Affordable Housing Project.pdf](#)
[2024-0014873-S7 Marin County USCG Point Reyes Housing Project.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR

- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes

Screen Summary

Compliance Determination

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements. The Phase 1 ESA identified the Chevron Bulk Plant (11095 State Route 1), located about 143 feet west-southwest and downgradient of the Project site. It was subject to cleanup, and the case was closed with no violations or residual concerns as of 2012. No surrounding facilities with active aboveground hazardous storage or bulk flammable material handling were found within one mile of the Project site (12).

Supporting documentation

[Phase I ESA\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

✓ No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. The Project site contains existing housing structures and does not support agriculture uses. The Natural Resources Conservation Service Web Soil Survey indicates the Project area contains soils of Statewide Importance (soil types 148, 114, and 105) (17). The Farmland Mapping and Monitoring Program of the California Department of Conservation, California Important Farmland Finder indicates the Project site primarily contains Urban and Built Up Land and Other Land; however, a small area in the northeast portion of the Project site contains Farmland of Local Importance (18). Environmental review under CEQA Farmland of Local Importance is not considered agricultural land (18,19). Additionally, no development would occur in this portion of the Project site. No impact on farmland, agricultural zoning, or a Williamson Act contract would occur.

Supporting documentation

[NRCS - 2205 - Web Soil Survey.pdf](#)

[California Important Farmland Finder.PNG](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

- ✓ FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

¹ Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

² If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

³ Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

No

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. A portion of the Project site, west of Lagunitas Creek, is located within the 100-year floodplain. The existing and proposed habitable structures are located outside of the mapped floodway as amended by FEMA on May 5, 2023, in the Letter of Map Amendment (6). Because the Project site parcel was still within the floodplain, in April 2025, the Project site was re-parceled and divided into three parcels: Parcel A, B, and C. Parcel A, which includes the housing located outside the mapped floodway. Only the proposed bioretention facilities and landscaping would occur within the floodway (Parcel C). No development would occur within Parcel B (5). A portion of the Project site, west of Lagunitas Creek, is located within the 100-year floodplain. The existing and proposed habitable structures are located outside of the mapped National Flood Insurance Program or Special Flood Hazard Area as amended by Federal Emergency Management Agency (FEMA) on May 5, 2023, in the Letter of Map Amendment. In April 2025, the Project site was re-parceled and divided into three parcels: Parcel A, B, and C. Parcel A, which includes the housing is located outside the mapped floodway. Only bioretention facilities and landscaping would occur within the floodway (Parcel C); therefore, the Federal mandatory flood insurance requirement does not apply (5,6).

Supporting documentation

[Recorder Disclaimer\(1\).pdf](#)

[Exhibit A Attach 3c County of Marin P3710 PLAN SET 3\(1\).pdf](#)

[Exhibit A Attach 3b County of Marin P3710 PLAN SET 2\(1\).pdf](#)

[Exhibit A Attach 3a County of Marin P3710 PLAN SET 1\(1\).pdf](#)

[FEMA LOMA Approved 2023\(1\).pdf](#)

[PM2025-042-2.pdf](#)

[PM2025-042-1.pdf](#)

[PM2025-042.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

Select all consulting parties below (check all that apply):

✓ State Historic Preservation Offer (SHPO) Completed

✓ Advisory Council on Historic Preservation Response Period Elapsed

✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

✓ Federated Indians of Graton Rancheria Completed

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

A Sacred Lands File (SLF) inventory request was sent by electronic mail (email) to the NAHC on August 2, 2023, to inquire about listed Sacred Sites located within or near to the Project Area and to obtain a list of local Native American tribes who may have additional information about Sacred Sites, Traditional Cultural Resources, or other properties of traditional religious and cultural importance located within or near to the Project Area.

Document and upload all correspondence, notices and notes (including comments and objections received below).

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

- Yes
- No

Step 2 – Identify and Evaluate Historic Properties

1. **Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**

APE for the Project includes the 33.59-acre property at 100 and 206 Commodore Webster Drive, Point Reyes Station, Marin County, California (APNs 119-240-73 and 119-236-10)

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
within project area	Identified	Yes	✓ Not Sensitive
within Project area	Identified	Yes	✓ Not Sensitive

Additional Notes:

2. Was a survey of historic buildings and/or archeological sites done as part of the project?

Yes

Document and upload surveys and report(s) below.
For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

No

Step 3 –Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Document reason for finding:

No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation, there are No Historic Properties Affected because the project will have no effect on the historic properties that are present. The project is in compliance with Section 106. An Archeological Study, dated October 2023, was conducted for the Project which included Tribal outreach to Federated Indians of Graton Rancheria. One National Register of Historic Places (NRHP)/ California Register of Historical Resources (CRHR) potentially eligible resource is located on the Project site. This resource would be avoided by the Project; therefore, it would not be impacted by the Project. The Project site is not within the viewshed of a historic district (20). Mitigation Measure CUL-1 would require preparation of an Archeological Monitoring Plan and archeological monitoring to be implemented during construction to protect potential historic and prehistorical resources which may be exposed during construction. A State Office of Historic Preservation (SHPO) consultation letter was sent on June 6, 2025, requesting concurrence with the findings regarding the historical resources that will be avoided on the site. Concurrence with the findings was granted because no response was received from SHPO during the 30 consultation period, per 36 CFR Part 800.3(c)(4) Failure of the SHPO/THPO to respond.

Supporting documentation

[AS Report_Point Reyes Station USCG_010824.pdf](#)
[2016 Historical Resources Study for the Point Reyes Coast Guard Project.pdf](#)
[AB52_Section 106_Wuksache Ltr_USCG site housing project.pdf](#)
[AB52_Section 106_Muwekma Ohlone Ltr_USCG site housing project.pdf](#)
[AB52_Section 106_Guidiville Ltr_USCG site housing project.pdf](#)
[AB52_Section 106_FIGR Ltr_USCG site housing project-Response.pdf](#)
[AB52_Section 106_FIGR Ltr_USCG site housing project.pdf](#)
[USCG Point Reyes Station SHPO Letter_060525.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD’s noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: “Compatible Land Uses at Federal Airfields”	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

New construction for residential use

Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
None of the above

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000’ from a major road, 3000’ from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

- ✓ Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: 45

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 45

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was acceptable: 45.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. The Project site is not within 3,000 feet of a railroad, 15 miles of a military or Federal Aviation

Administration civil airfield, or a major roadway (2). The on-site water treatment system would include pumps, aeration blowers, and a backup emergency generator to ensure consistent power supply during periodic power outages. The emergency generator is located approximately 150 feet from the nearest residential receptor. Although the emergency generator would only be used sporadically in the case of emergencies causing power outages (e.g., storm events), the noise from operation of the wastewater treatment equipment has the potential to exceed HUD day night average interior noise standard of 45 dB Leq at the nearest residential property. Mitigation Measure NOI-1 specifies standards for the wastewater treatment plant design to reduce noise to a less than significant level. Additionally, a Noise Mitigation Plan would be developed for the Project and submitted to the County prior to construction of the wastewater treatment system (1).

Supporting documentation

[uscg-point-reyes-ismnd_draft_041524\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

Based on the response, the review is in compliance with this section.

No

Screen Summary

Compliance Determination

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. The Project is not located on a sole source aquifer, therefore the Project would have no impact on sole source aquifers (21).

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

No

✓ Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."

✓ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

Screen Summary

Compliance Determination

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. The USFWS National Wetlands Inventory indicates a portion of the Project site is within a freshwater forested/shrub wetland (PFO1A), and fresh water emergent wetland (PEM1A) (22). The LCP requires a 50-foot buffer on the edge of riparian vegetation associated with a coastal stream; therefore, the Project would not involve construction activities or facilities within the 50-foot riparian buffer which includes wetlands (1).

Supporting documentation

[ESHA Buffer.pdf](#)

[USFWS - 2025 - National Wetlands Inventory.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[california.html](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

Yes

No

Based on the response, the review is in compliance with this section.

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No