

Section 3.16

Utilities and Service Systems

This section provides background information on utilities and service systems, including water supply, wastewater and stormwater systems, solid waste, and energy. The analysis considers increased demand on water supply, wastewater and stormwater treatment and disposal systems, and solid waste collection and disposal systems that may result from the San Rafael Transit Center Replacement Project (proposed project) and other build alternatives. In addition, the analysis considers whether the proposed project would result in the wasteful use of energy, which is covered in more detail in Section 3.5, Energy. Detailed information regarding stormwater and drainage is covered in Section 3.9, Hydrology and Water Quality. Impacts related to the No-Project Alternative are discussed in Chapter 5, Alternatives to the Project.

3.16.1 Existing Conditions

3.16.1.1 Regulatory Setting

State

California Energy Commission

The California Energy Commission regulates the provision of natural gas and electricity within the state. The California Energy Commission is the state's primary energy policy and planning agency and has five major responsibilities: forecasting future energy needs and keeping historical energy data, licensing thermal power plants 50 megawatts or larger, promoting energy efficiency through appliance and building standards, developing energy technologies and supporting renewable energy, and planning for and directing the state response to energy emergencies.

California Integrated Waste Management Board

The California Integrated Waste Management Board is the state agency designated to oversee, manage, and track California's 76.5 million tons of waste generated each year. It is one of the six agencies under the umbrella of the California Environmental Protection Agency. The California Integrated Waste Management Board develops laws and regulations to control and manage waste; enforcement authority is typically delegated to the local government. The board works jointly with local government to implement regulations and fund programs.

Pursuant to the California Integrated Solid Waste Management Act of 1989, all cities in California are required to reduce the amount of solid waste disposed of in landfills. Contracts that include work that will generate solid waste, including construction and demolition debris, have been targeted for participation in source-reduction, reuse, and recycling programs. Contractors are urged to manage solid waste to divert waste away from disposal in landfills (particularly Class III landfills) and to maximize source reduction, reuse, and recycling of construction and demolition debris.

Wastewater

In the project area, wastewater is regulated by the agencies listed below.

- State Water Resources Control Board
- San Francisco Bay Regional Water Board
- California Department of Pesticide Regulation
- California Department of Toxic Substances Control

Local

City of San Rafael General Plan 2020

The Land Use, Infrastructure, and Sustainability Elements of *The City of San Rafael General Plan 2020* contain the following policies and programs that are applicable to the proposed project (City of San Rafael 2016a).

Policy LU-2. Development Timing. For health, safety and general welfare reasons, new development should only occur when adequate infrastructure is available consistent with the following findings:

e. Sewer, water, and other infrastructure improvements will be available to serve new development by the time the development is constructed.

Program LU-2a Development Review. Through the development and environmental review processes, ensure that policy provisions are evaluated and implemented. The City may waive or modify any policy requirement contained herein if it determines that the effect of implementing the same in the issuance of a development condition or other approvals would be to preclude all economically viable use of a subject property.

Policy I-3 Availability of Utilities. Promote the availability of reliable and reasonably priced utilities necessary for businesses and residences to prosper.

Program I-3a Capacity Management. Work with the Central Marin Sanitation Agency and San Rafael Sanitation District to ensure completion of a Capacity Management Alternative Study to determine the scope of needed improvements, costs, and expected benefits to avoid excess of water treatment capacity.

Program I-3b Water Supply Impacts. Work with Marin Municipal Water District to meet the projected water demand and to ensure reduction of existing and projected water supply impacts.

Policy I-10 Sewer Facilities. Existing and future development needs should be coordinated with responsible districts and agencies to assure that facility expansion and/or improvement meets Federal and State standards and occurs in a timely fashion.

Policy SU-5 Reduce Use of Non-Renewable Resources. Reduce dependency on nonrenewal resources.

Program SU-5d Water Efficiency Programs. Develop and implement water efficiency and conservation programs to achieve a 30% reduction in water use by 2020, including water efficient landscape regulations, PACE financing, water audits, upgrades upon resale, education and outreach. **Program SU-5e Water Recycling.** Support the extension of recycled water distribution infrastructure. Require the use of recycled water where available.

Policy SU-10 Zero Waste. Reduce material consumption and waste generation, increase resource re-use and composting of organic waste, and recycle to significantly reduce and ultimately eliminate landfill disposal.

Program SU-10a Zero Waste. Implement and monitor the progress of actions contained in the Zero Waste Goal and Zero Waste Strategic Plan.

Program SU-10e Recycling. Encourage efforts to promote recycling, such as encouraging businesses to recycle building and other materials, promoting composting by restaurants, institutions and residences, and supporting Marin Conservation Corps' work to promote recycling.

Program SU-10g Recycling for Apartments and Nonresidential Buildings. Encourage recycling facilities and programs for apartment and nonresidential buildings. Consider the cost and benefits of expanding recycling facilities and programs for apartment and nonresidential buildings.

Program SU-10h Demolition Waste. Study ways to actively encourage greater recycling and reuse of demolition waste.

Policy SU-13 Monitor Sustainability Objectives and Indicators. Monitor success in achieving sustainability objectives and greenhouse gas reductions.

Program SU-13b Future Development and Capital Improvements. Evaluate future development applications and the City's Capital Improvement Program against compliance with the Sustainability Element and the GHG Emissions Reduction Strategy.

Draft San Rafael General Plan 2040

The City of San Rafael (City) is in the process of updating ~~The adopted City of San Rafael General Plan 2020/2040 in August 2021. Published in October 2020, the public review draft San Rafael General Plan 2040~~ includes goals and policies relevant to utilities ~~under in the following elements:~~ Land Use Element; Neighborhoods Element; Parks, Recreation, and Open Space Element; Safety and Resilience Element; and Community Services and Infrastructure Element. See below for relevant goals and policies ~~(City of San Rafael 2021) (City of San Rafael 2020a):~~

Land Use Element

- **Policy LU-1.2: Development Timing.** Allow new development only when adequate infrastructure is available, consistent with the following:... c) Sewer, water, and other infrastructure improvements needed to serve the proposed development have been evaluated and confirmed to be in place or to be available to serve the development by the time it is constructed.

Neighborhoods Element

- **Policy NH-2.6: Neighborhood Sustainability.** Adapt existing buildings, energy, and transportation systems to reduce the neighborhood's carbon footprint, improve energy self-sufficiency, phase out gas-powered utilities and vehicles, reduce overhead wires and service lines, increase awareness of natural systems, and improve environmental health.

Parks, Recreation, and Open Space Element

- **Policy PROS-3.9: Utilities in Open Space.** Discourage large-scale utility infrastructure such as electric transmission lines, large wind turbines, and cellular phone towers in local open space areas. Where such facilities already exist, or where there are no other siting options, utilities should be located and designed to minimize harm to avian life and the area's environmental and visual quality.

Safety and Resilience Element

- **Policy S-1.3: Location of Public Improvements.** Avoid locating public improvements and utilities in areas with high hazard levels. When there are no feasible alternatives, require effective mitigation measures to reduce the potential for damage.

- **Policy S-2.4: Post-Earthquake Inspections.** Require post-earthquake inspections of critical facilities and other impacted buildings and restrict entry into compromised structures as appropriate. Following a major earthquake, inspections shall be conducted as necessary in conjunction with other non-city public agencies and private parties to ensure the structural integrity of water storage facilities, storm drainage structures, sewer lines and treatment facilities, transmission and telecommunication facilities, major roadways, bridges, elevated freeways, levees, canal banks, and other important utilities and essential facilities.

Community Services and Infrastructure Element

Goal CSI-4: Reliable, Efficiently Managed Infrastructure. Support reliable, cost-effective, well-maintained, safe and resilient infrastructure and utility services.

- **Policy CSI-4.9: Wastewater Facilities.** Ensure that wastewater collection, treatment and disposal infrastructure is regularly maintained and meets projected needs. Improvements should be programmed to meet state and federal standards, respond to sea level rise and seismic hazards, repair and replace aging or leaking pipes, and protect environmental quality.
- **Policy CSI-4.12: Recycled Water.** Encourage additional wastewater recycling by the Las Gallinas Valley Sanitary District, initiation of wastewater recycling by the Central Marin Sanitation Agency, additional recycled water distribution by MMWD, and additional use of reclaimed water where supply (“purple pipe”) is available.
- **Policy CSI-4.2: Adequacy of City Infrastructure and Services.** As part of the development review process, require applicants to demonstrate that their projects can be adequately served by the City’s infrastructure. All new infrastructure shall be planned and designed to meet the engineering standards of the City and various local service and utility providers.
- **Policy CSI-4.14: Utility Undergrounding.** Continue to pursue undergrounding of overhead utility lines, and support maintenance and replacement programs to reduce wildfire hazards.
- **Policy CSI-4.9: Wastewater Facilities.** Ensure that wastewater collection, treatment and disposal infrastructure is regularly maintained and meets projected needs. Improvements should be programmed to meet state and federal standards, respond to sea level rise and seismic hazards, repair and replace aging or leaking pipes, and protect environmental quality.
- **Policy CSI-4.17: Reducing Landfilled Waste Disposal.** Reduce landfilled waste disposal and related greenhouse gas emissions by reducing material consumption; requiring curbside collection and composting of organic materials; increasing recycling, re-use, and resource recovery; and encouraging the use of recyclable goods and materials.
- **Policy CSI-4.18: Waste Reduction Advocacy and Education.** Work with other cities and the County of Marin to advocate for programs and legislation to reduce waste and share waste reduction responsibilities with the manufacturers of consumer products.

~~Draft~~ Downtown San Rafael Precise Plan

~~As part of the updated general plan process, the City is preparing the~~ The City adopted the Downtown San Rafael Precise Plan in August 2021. The City released a public review draft of the document in December 2020. The Downtown San Rafael Precise Plan includes Chapter 8, Implementation. The following action is relevant to utilities (City of San Rafael Community Development Department 2020b2021).

Chapter 8, Implementation

- **Recommended Action C. Utility Infrastructure.** Downtown has sufficient capacity in its utility infrastructure systems to support the additional uses proposed by the Precise Plan. The Plan recommends the implementation of planned infrastructure upgrades, and to consider strategies to adapt to climate change and its related impacts.

San Rafael Climate Change Action Plan 2030

The *San Rafael Climate Change Action Plan 2030* was adopted in 2019, and is a tool to develop programs and actions needed to reduce greenhouse gas emissions. San Rafael's first ever Climate Change Action Plan was adopted in 2009 and since then the plan has been updated to the 2030 document. The plan includes energy and water conservation strategies to reduce San Rafael's impacts on climate change (City of San Rafael 2019b).

California Green Building Standards Code

In 2019, Ordinance No. 1974 of the San Rafael Municipal Code amended the building code regulations adopting the 2019 edition of the California Green Building Standards (CalGreen) Code. The purpose of the code is to improve public health and safety through effective building construction and design and also to do so in a sustainable way emphasizing energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality (City of San Rafael 2019c).

Marin Municipal Water District

Marin Municipal Water District (MMWD) wrote Title 13, Water Service Condition and Water Conservation Measures, Chapter 13.02, Water Conservation and Dry Year Water Use Reduction Program, to provide a water conservation plan to maximize the water supply during periods of relatively normal rainfall and minimize the effect of a shortage of water on the district's consumers during an extended dry-weather period (drought) for all new construction as well as certain remodels and landscape rehabilitations.

Ordinance Number 426, amending Title 13, became effective on February 1, 2016, and added an element to Title 13 requiring applicants for new water service or applicants requesting an expansion of water service for a substantial remodel of a residential or commercial project to install a graywater recycling system on site. This requirement supports ongoing efforts to reduce demand on the potable water system (MMWD 2016).

3.16.1.2 Environmental Setting

All build alternatives are within Downtown San Rafael. Each alternative is within 500 feet north of the existing San Rafael Transit Center and is bordered by a mix of office and retail uses. Although there are multiple build alternatives, due to the close proximity of all build alternatives and similar site features, they are hereafter referred to as the "proposed project." Each project site would slightly vary in site area and location, but would remain relatively the same for utilities unless otherwise noted.

Water Supply

MMWD supplies water to the eastern corridor of Marin County from north of the Golden Gate Bridge up to but not including Novato. MMWD services the incorporated cities and town of San Rafael, Mill Valley, Fairfax, San Anselmo, Ross, Larkspur, Corte Madera, Tiburon, Belvedere, and Sausalito. MMWD's service area covers approximately 147 square miles and 190,000 customers, using approximately 61,800 active service connections. Surface water supplies come from local reservoirs and supplies imported from the Sonoma County Water Agency (MMWD 2017).

MMWD operates seven reservoirs, including Alpine, Bon Tempe, Kent, Lagunitas, and Phoenix Lake, and two reservoirs, Nicasio and Soulajule, outside of the MMWD area. In total, these reservoirs have a capacity of 79,566 acre-feet (25,927 million gallons) and an estimated yield of 29,020 acre-feet (9,456 million gallons) per year. Therefore, MMWD has limited storage capacity, with existing storage capacity able to serve 2 years of demand. During droughts, MMWD has historically been able to meet water demands during extreme droughts through rationing, conservation, and increased imports from the Sonoma County Water Agency. MMWD prepared the *Water Resources Plan 2040* to evaluate different resiliency alternatives for water supply planning decisions moving forward. The plan researched five different alternatives to improve MMWD's water supply availability and reliability and will focus on implementing one alternative in the future. Currently, MMWD has sufficient supply to meet demands until 2040. However, as climate change continues to alter storm patterns and potential flooding, MMWD will need to evaluate and improve upon water supply storage capabilities (MMWD 2017).

Wastewater

The San Rafael Sanitation District serves the Central San Rafael area, which includes the project area. The district maintains 32 pump station and 13 miles of pressurized sewer pipes, and cleans 132 miles of sewer pipelines. The water is then transported for treatment to the Central Marin Sanitation Agency, which is the largest wastewater treatment facility in Marin County and meets and exceeds all federal and state regulatory requirements (City of San Rafael n.d., 2016b). The Central Marin Sanitation Agency is a joint powers agency made of Ross Valley Sanitary District, Sanitary District No. 2 of Marin County, the City of Larkspur, and the San Rafael Sanitation District (CMSA 2019). On average, this treatment facility treats approximately 6 billion gallons of wastewater each year from households and businesses in central Marin County, which then gets released, equating to approximately 6 billion gallons each year that is released back into San Francisco Bay (City of San Rafael 2016b). In the 2019 fiscal year, the Central Marin Sanitation Agency treated 13.3 million gallons per day and 4.8 billion gallons of wastewater (CMSA 2019).

Stormwater

The San Rafael stormwater system is designed to convey stormwater away from urban areas to local creeks and rivers, and ultimately to the San Francisco Bay. The City is in a Phase II Small Municipal Separate Storm Sewer System. See Section 3.9, Hydrology and Water Quality, for further information regarding stormwater.

Solid Waste

Marin Sanitary Service provides weekly garbage, recycling, and composting services to commercial customers in San Rafael and would service the project area. Marin Sanitary Service also operates the Resource Recovery and Recycling Plant and a transfer station where waste from commercial collectors is hauled by transfer trucks to Redwood Landfill. The project area is serviced by the Redwood Landfill in northern Marin County, which is permitted to accept 2,310 tons of material daily (Waste Management 2021). Redwood Landfill, Inc. applied to the Marin County Environmental Health Services Department for a Revised Solid Waste Facilities Permit to expand capacity of a 222.5-acre landfill. The project was approved and increased capacity of the landfill to 26.1 million cubic yards, facilitating expected capacity until at least 2037 (County of Marin 2020).

Natural Gas and Electricity

Pacific Gas and Electric provides natural gas and electric services to the project area (MCE 2021). With a relatively mild Mediterranean climate and strict energy-efficiency and conservation requirements, California has lower energy consumption rates than other parts of the country. According to the U.S. Energy Information Administration, California's total energy consumption is the second-highest in the nation but per-capita energy consumption in 2018 ranked the fourth-lowest due to energy efficiency programs and the mild climate of California (U.S. Energy Information Administration 2020).

See Section 3.5, Energy, for additional details regarding energy at and near the project area.

3.16.2 Environmental Impacts

3.16.2.1 Methodology

Four different build alternatives, which are all in Downtown San Rafael within 500 feet of the existing transit center, are being evaluated. As such, utilities and service systems were analyzed for the proposed project in general terms, as utilities are expected to have the same effects in each build alternative. Impacts on water supply, wastewater and stormwater systems, solid waste, and energy were evaluated based on reviewing *The City of San Rafael General Plan 2020-2040*, MMWD, and Central Marin Sanitation Agency document and plans.

3.16.2.2 Thresholds of Significance

The following California Environmental Quality Act Appendix G thresholds identify significance criteria to be considered for determining whether a project could have significant impacts related to utilities and service systems.

Would the proposed project:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

3.16.2.3 Impacts

Impact UT-1: Require or Result in the Relocation or Construction of New or Expanded Water, Wastewater Treatment, or Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities, the Construction or Relocation of Which Could Cause Significant Environmental Effects

All Build Alternatives

Construction

The proposed project would entail the construction of 17 bus bays, a customer service facility, and other transit, pedestrian, and bicycle improvements.

Construction is estimated to take up to 18 months and would include mobilization, demolition, utility work, vertical structures work, finishing, and inspections. The proposed transit center facilities would require connection to existing sewer, water, and power infrastructure to operate the planned restrooms, Golden Gate Bridge, Highway and Transportation District (District) offices, staff kitchen, customer support area, and public lobby. The proposed facility would also require modifications to existing stormwater infrastructure. In addition, the proposed project would provide wireless internet capabilities for District operation facilities and passengers.

Water

Water would be required for construction during the following activities: dust control, concrete mixing, equipment and site cleanup, irrigation for the establishment of plants and landscaping, and water line testing and flushing. Given the scale of the proposed project, additional water demand during the temporary, short-term construction phase is expected to be minimal and existing water facilities would adequately cover this temporary demand for water. Temporary onsite water tanks and water trucks would provide water for fire water support, dust suppression, and construction needs through an agreement with municipal or private suppliers. Drinking water and water for sanitation facilities would be trucked into the project area.

Stormwater

The construction of the proposed project would not substantially modify the existing stormwater drainage patterns at the project area. The project area is in an urban area, is fully paved, and would not add any additional impervious surface area to the project sites. Although the proposed project would require the removal of existing storm drain infrastructure and the installation of new inlets, manholes, and bioretention facilities, the stormwater volume and sheet flow direction and volume would not be altered. As the proposed project would disturb more than 1 acre, it would require coverage under the state's Construction General Permit. Coverage under this permit requires developing and complying with a stormwater pollution prevention plan, which would include best management practices and recommendations that would prevent environmental effects related to stormwater drainage. The stormwater pollution prevention plan would include erosion control best management practices. See Section 3.9, Hydrology and Water Quality, for further discussion of drainage in the project area.

Wastewater

Construction of the proposed project would not generate a substantial amount of wastewater. During construction, a local sanitation company would provide and maintain appropriate sanitation facilities (i.e., portable toilets). If necessary, additional temporary facilities would be placed at specific construction locations.

Electricity, Natural Gas, and Telecommunications

Construction of the proposed project would require electricity for construction equipment and generator use. The proposed project would require new connections to existing electricity, natural gas, and telecommunication lines in the vicinity of the project area. However, due to the urban nature of the proposed project, new connections would suffice to fill project need and no additional electric power, natural gas, or telecommunications facilities would need to be constructed to accommodate the proposed project. See Section 3.5, Energy, for additional details regarding energy uses in the project area.

Based on the analysis above, construction of the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; therefore, this impact would be **less than significant**. No mitigation is required.

Operations

Operation of the proposed project would generate minimal water, wastewater, stormwater, and energy needs. As the proposed project would be replacing the existing transit center, the overall increased demand for these services would be minimal. The proposed project would utilize the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) green building certification system as a tool for evaluating and measuring achievements in sustainable design. The proposed project's new construction and substantial renovation goal would be to achieve, at a minimum, LEED® Gold certification for the customer service building, which would represent an improvement in energy efficiency compared to the existing facility. Additionally, the proposed project would include the installation of solar panels on site. There would be the same number of employees on site as for the current transit center, consisting of seven customer service staff and one security guard. Daily commuters would only be generating water and wastewater needs by using water fountains and restroom facilities on site.

Electrical facility needs at the transit center and platforms include ticketing and fare collection machines and real-time transit information signs. Additional electrical requirements and infrastructure may be needed for onsite charging of future battery electric buses at the transit center bus bays. However, because the preferred technology for fleetwide rollout of zero-emission buses has not yet been determined, these utility needs would be incorporated in a future project. Fleetwide rollout of zero-emission buses, along with related infrastructure to support the zero-emission fleet, is a separate planning initiative that is outside the scope of the proposed project. The District would implement the fleetwide rollout in a manner that is consistent with CEQA and any additional energy and utility needs for the fleetwide rollout would be addressed as part of that initiative. No new natural gas or telecommunication facilities would be required to fulfill energy needs for the operation of the proposed project. See Section 3.5, Energy, for additional details regarding operational energy needs.

As the proposed project would not require the relocation, construction, or expansion of water, wastewater treatment, or stormwater drainage facilities, and no natural gas or telecommunication facilities are required, the proposed project would have a *less than significant* impact.

Mitigation Measures

No mitigation is required.

Impact UT-2: Have Sufficient Water Supplies Available to Serve the Project and Reasonably Foreseeable Future Development During Normal, Dry, and Multiple Dry Years

All Build Alternatives

Construction

As discussed above, water quantities used for the proposed project are expected to be minimal. The majority of water use would take place during construction. Water demand during construction would be minimal and temporary and would be served utilizing the same infrastructure and sources as those during project operation. Sufficient water supplies are available to serve the proposed project during construction, and this impact would be *less than significant*.

Operations

Operation of the proposed project is not anticipated to require an increase in water compared to the existing transit center. There would be an equivalent number of employees on the project area compared to the current number of employees operating the existing transit center. On an annual basis, employees would be expected to consume the same amount of water for daily activities. The proposed project is anticipated to receive the same volume of visitors as the existing facility that would continue to utilize bathroom and water fountain facilities.

The use of water is expected to be minimal, and no new or expanded entitlements to supply the proposed project during construction or operation are anticipated. This impact would be *less than significant*.

Mitigation Measures

No mitigation is required.

Impact UT-3: Result in a Determination by the Wastewater Treatment Provider, Which Serves or May Serve the Project That It Has Adequate Capacity to Serve the Project's Projected Demand in Addition to the Provider's Existing Commitments

All Build Alternatives

Construction

As discussed previously, the proposed project would be relocating the existing transit center to another location in Downtown San Rafael and would provide traffic, transit, pedestrian, and bicycle

improvements. Demolition and construction activities for the proposed project would result in a temporary increase in wastewater generation as a result of onsite construction workers. Wastewater generation during construction would be minimal and temporary. In addition, construction workers typically use portable toilets and sinks, which do not flow to the wastewater conveyance system. Therefore, sufficient wastewater treatment capacity is available to serve the proposed project during construction and this impact would be *less than significant*.

Operations

As the proposed project's uses would be moved from the old transit center to a new project site, and ridership capacity is expected to remain consistent, additional operational wastewater use is not expected for activities such as hand-washing, toilet flushing, and bus washing. There would be a negligible increase in operational wastewater. Furthermore, the proposed project would not include design features that would generate substantial additional wastewater. Therefore, impacts would be *less than significant*.

Mitigation Measures

No mitigation is required.

Impact UT-4: Generate Solid Waste In Excess of State or Local Standards, or in Excess of the Capacity of Local Infrastructure, or Otherwise Impair the Attainment of Solid Waste Reduction Goals; and Comply with Federal, State, and Local Management and Reduction Statutes and Regulations Related to Solid Waste

All Build Alternatives

Construction

Demolition and construction activities for the proposed project would result in a temporary increase in solid waste generation. Solid waste generation would occur periodically during construction. However, the increase would be minimal and temporary. In addition, the proposed project would comply with the latest 2019 CALGreen Code, which has been adopted by the City of San Rafael Municipal Code, which was adopted through Ordinance No. 1974. Per CALGreen Code requirements, at least 65 percent of construction waste generated for new construction projects must be diverted. In addition, a construction waste management plan must be prepared (CalRecycle 2020). Through compliance with the CALGreen Code, as verified by the City of San Rafael, the proposed project would not generate solid waste in excess of state or local standards or of the capacity of local infrastructure during construction and would not conflict with solid waste regulations. This impact would be *less than significant*.

Operation

The Redwood Landfill would serve the proposed project and is approximately 14 miles north of the project area. This landfill has a capacity of 26.1 million cubic yards and is expected to have remaining capacity until at least 2037 (County of Marin 2020). Currently, the Redwood Landfill is permitting to accept 2,310 tons of material daily (Waste Management 2020).

As the proposed project's uses would be moved from the existing transit center to the new project area, maintaining the same number of employees, an increase in solid waste is not anticipated. The proposed project would be required to comply with California Assembly Bill 341, which requires commercial and public entities that generate more than 4 cubic yards of waste to either subscribe to recycling services, self haul, or arrange for periodic pickup of recyclables. Furthermore, as of January 1, 2019, all business that generate 4 or more cubic yards of commercial solid waste per week must also enroll in services to collect organic waste (City of San Rafael 2019a).

Based on the analysis above, the proposed project would not generate solid waste in excess of state or local standards or of the capacity of local infrastructure during operation and would not conflict with solid waste regulations. Therefore, the impact would be *less than significant*.

Mitigation Measures

No mitigation is required.