

4.0 INTRODUCTION TO THE ANALYSIS

4.0.1 INTRODUCTION

The technical chapters of the EIR analyze the potential impacts of buildout of the proposed project on Biological Resources, Greenhouse Gas Emissions, Hydrology and Water Quality, and Transportation. Chapters 4.1 through 4.4 of the EIR include the following: the existing environmental setting; regulatory context; standards of significance; method of analysis; and project-specific impacts and mitigation measures. Additionally, Chapters 4.1 through 4.4 describe the cumulative impacts of the project combined with past, present, and reasonably probable future projects for each issue area. The format of each of the technical chapters is described at the end of this chapter. It should be noted that technical reports are either attached to this EIR or available at the City by request.

4.0.2 DETERMINATION OF SIGNIFICANCE

Under CEQA, a significant effect is defined as a substantial or potentially substantial adverse change in the environment (Public Resources Code Section 21068). The Guidelines implementing CEQA direct that the determination be based on scientific and factual data. The specific criteria for determining the significance of a particular impact are identified within the impact discussion in each chapter and are consistent with significance criteria set forth in the CEQA Guidelines or as based on the professional judgement of the EIR preparers.

Significance Criteria

The CEQA Guidelines define a significant effect on the environment as “a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.” In addition, the Guidelines state, “An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.” (CEQA Guidelines Section 15382).

As presented in Section 4.0.5 below, the level of significance of an impact prior to mitigation is included at the end of each impact discussion throughout the technical chapters of this EIR. The following levels of significance prior to mitigation are used in this EIR:

- 1) Less than Significant: Impacts that may be adverse, but that do not exceed the specified thresholds of significance;
- 2) Significant: Impacts that exceed the defined standards of significance and require mitigation;
- 3) Less than Cumulatively Considerable: Where cumulative impacts have been identified, but the project’s incremental contribution towards the cumulative impacts would not be considered significant; and
- 4) Cumulatively Considerable: Where cumulative impacts have been identified and the project’s incremental contribution towards the cumulative impact would be considered significant.



If an impact is determined to be significant or cumulatively considerable, mitigation is included, if available, in order to reduce the specific impact. A statement of the level of significance of an impact after mitigation is also included in each impact discussion throughout the technical chapters of this EIR. The following levels of significance after implementation of mitigation are used in the EIR:

- 1) Less than Significant: Impacts that exceed the defined standards of significance but can be eliminated or reduced to a less-than-significant level through the implementation of feasible mitigation measures;
- 2) Less than Cumulatively Considerable: Where the project's incremental contribution towards cumulative impacts would be eliminated or reduced to a less than cumulatively considerable level through the implementation of feasible mitigation measures; and
- 3) Significant and Unavoidable Impact: An impact (project-level or cumulative) that cannot be eliminated or reduced to a less-than-significant or less than cumulatively considerable level through the implementation of feasible mitigations measures.

Each environmental area of analysis uses a distinct set of significance criteria. The significance criteria are identified at the beginning of the Impacts and Mitigation Measures section in each of the technical chapters of this EIR. Although significance criteria are necessarily different for each resource considered, the provided significance levels ensure consistent evaluation of impacts for all resource areas evaluated.

4.0.3 ENVIRONMENTAL ISSUES DISMISSED IN THE INITIAL STUDY

The Initial Study prepared for the proposed project (Appendix A to this EIR) includes a detailed environmental checklist addressing a range of technical environmental issues. For each technical environmental issue, the Initial Study identifies the level of impact for the proposed project. The Initial Study identifies the environmental effects as “no impact,” “less than significant,” “less than significant with mitigation incorporated,” and “potentially significant.”

Impacts identified in the Initial Study as less than significant, less than significant with mitigation incorporated, or no impact are summarized below. All remaining issues identified in the Initial Study as potentially significant are discussed in the subsequent technical chapters of this EIR.

- *Aesthetics (All Checklist Questions)*: Although the proposed project site is located within one mile of the Rocky Memorial Dog Park, a designated scenic vista, due to the intervening development between the two locations and the flat nature of the site, development of the proposed project would not block views of the hills in the surrounding environs. Furthermore, the project is not located in the vicinity of an officially designated State Scenic Highway. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista and would not substantially damage scenic resources. The Initial Study concluded that, because the project site is located within an urbanized area and the proposed project would be consistent with the uses allowed by the site's zoning and General Plan land use designations, impacts related to a conflicts with applicable zoning and other regulations governing scenic quality would be less than significant. In addition, the introduction of new sources of light and glare would be less than significant. Overall, the proposed project would result in *less-than-significant* impacts related to aesthetics.



- *Agriculture and Forestry Resources (All Checklist Questions)*: The project site is not subject to a Williamson Act program, and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, development of the project would not result in the conversion of Farmland to non-agricultural use, and a *less-than-significant* impact would occur. The project is not considered forest land or timberland and is not zoned for Timberland Production; thus the proposed project would have *no impact* regarding conversion of such land.
- *Air Quality (All Checklist Questions)*: The project's construction and operational emissions were quantified as part of a Construction Health Risk and Greenhouse Gas Assessment prepared for the project by Illingworth & Rodkin, Inc. Because the project's construction and operational criteria pollutant emissions would be below the applicable thresholds of significance, the project would not be considered to conflict with implementation of the applicable air quality plan or result in a cumulatively considerable increase of a criteria pollutant for which the project region is non-attainment. Thus, a *less-than-significant* impact would occur.

The nearest existing sensitive receptors to the project site are the Casa Grande Senior Apartments to the north and the Casa Grande Subdivision to the south. The Initial Study determined that the proposed project would not expose any sensitive receptors identified in the project vicinity to excess concentrations of localized carbon monoxide (CO), toxic air contaminants (TACs), or criteria pollutants during construction or operation of the project. Consequently, the project would result in a *less-than-significant* impact related to the exposure of sensitive receptors to substantial pollutant concentrations.

Construction activities often include diesel-fueled equipment and heavy-duty trucks, which could create odors associated with diesel fumes that may be considered objectionable, as well as emissions of dust. However, given the existing State and local regulations governing the use of construction equipment, the Initial Study determined that substantial objectionable odors would not be expected to occur during construction activities. With respect to dust, the proposed project would be required to implement the Bay Area Air Quality Management District's (BAAQMD) Basic Construction Mitigation Measures (BCMMs) during project construction, which would substantially reduce emissions of dust. Therefore, construction and operation of the project would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and a *less-than-significant* impact would result.

It should be noted that the Construction Health Risk and Greenhouse Gas Assessment prepared for the project by Illingworth & Rodkin, Inc. that was used for the Initial Study analysis did not specifically account for the construction activities associated with the proposed fill necessary for the elevated pads upon which the new residences would be constructed. The Construction Health Risk and Greenhouse Gas Assessment has since been updated to reflect such details (i.e., the import of 4,788 cubic yards of fill material). The updated analysis confirms that, even with the inclusion of soil import activities, the construction emissions associated with the proposed project would remain below the applicable BAAQMD thresholds of significance. Therefore, the conclusions within the Initial Study related to air quality remain adequate.



- *Biological Resources (Checklist Question f):* The project site is not located in an area with an approved Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP); therefore, *no impact* would occur regarding a conflict with a HCP/NCCP.
- *Cultural Resources (All Checklist Questions):* According to the Cultural Resources Study (CRS) prepared for the proposed project, historical and archeological resources have not been identified within the project site. Although the two existing on-site structures, due to their age alone, appear to be eligible for listing in the National Register of Historic Places (NRHP), such structures do not meet the criteria for NRHP listing. Thus, the proposed project would have a *less-than-significant* impact upon historic resources. While known archeological resources are not present on the project site, the site is located within the Coastal Miwok ethnographic territory; however, with implementation of Mitigation Measure V-1, the Initial Study determined that impacts related to archeological resources would be reduced to a *less-than-significant* level. Similarly, although the project site does not include evidence suggesting that human remains have been interred within the site boundaries, in the event that human remains are encountered during ground-disturbing activities, the project would comply with all requirements set forth by California Health and Safety Code Section 7050.5. Compliance with California Health and Safety Code Section 7050.5 and performance of actions therein would ensure that in the event of accidental discovery of historically significant human remains, all potential impacts would remain *less than significant*.
- *Energy (All Checklist Questions):* The proposed project is anticipated to result in increased energy usage during construction and operations of the project. However, the Initial Study determined that energy usage associated with the proposed project would not be considered a wasteful, inefficient, or unnecessary consumption of energy resources and would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Thus, the proposed project would result in a *less-than-significant* impact related to energy.
- *Geology and Soils (All Checklist Questions):* According to the Initial Study, because the project is not located within an Alquist-Priolo Earthquake Fault Zone, the proposed project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault or strong seismic ground shaking, and a *less-than significant* impact would occur. In addition, given that the project site is located on relatively flat terrain, the project site would not be in an area where landslides are expected to occur. As a result, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving landslides, and the proposed project would result in a *less-than-significant* impact.

While the project site has moderate susceptibility to liquefaction and subsidence, the Initial Study determined that given compliance with California Building Standards Code (CBSC) requirements, a *less-than-significant* impact would occur. Similarly, because the proposed project would disturb one or more acres of land, the proposed project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, as well as local regulations, which would ensure that impacts related to soil erosion or loss of topsoil would be *less than significant*. However, the Initial Study determined that the project site has very high potential for expansion; and implementation of Mitigation Measure VII-1, which requires final improvement plans for the proposed



project to show that the project design adheres to all engineering recommendations provided in the site-specific Geotechnical Investigation prepared by PJC & Associates, Inc., would reduce impacts related to soil expansion to a *less-than-significant* level.

Furthermore, the proposed project would connect to an existing sewer system, and thus, would not require the use of septic systems. Therefore, the proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; and the project would result in *no impact*.

Finally, because the project site has been subject to significant ground disturbance, is not known to contain identified paleontological resources, and because the proposed project would be required to comply with local regulations concerning the protection of paleontological resources, the Initial Study determined that impacts upon such resources would be *less than significant*.

- *Hazards and Hazardous Materials (All Checklist Questions)*: Due to the residential use of the proposed project, project operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, during project construction, the project contractor would be required to comply with all California Health and Safety Codes and local County ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Thus, the Initial Study determined that the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and a *less-than-significant* impact would occur.

According to the Phase I Environmental Site Assessment (Phase I ESA) prepared for the proposed project, the existing residences located on-site use septic tanks for wastewater disposal. Without proper removal of the septic tanks and soil testing to confirm contamination has not occurred, the project could create a significant hazard to the environment. In addition, given their age, the on-site structures have the potential to contain asbestos-containing materials and lead-based paints. However, the Initial Study determined that with implementation of Mitigation Measures IX-1 through IX-4, which require compliance with federal, State, and local regulations related to the demolition of on-site structures and abandonment and removal of the existing on-site septic systems and well, impacts related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials would be reduced to a *less-than-significant* level.

The project site is located within a quarter mile of the Casa Grande High School. However, as discussed above, operation of the project site is not anticipated to result in the release of hazardous materials; furthermore, implementation of Mitigation Measures IX-1 through IX-4 would ensure that all recognized environmental concerns within the project site are handled in accordance with federal, State, and local regulations. Thus, impacts would be reduced to a *less-than-significant* level. In addition, the project site is not identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and *no impact* would occur. Although the project site is located within two miles of the Petaluma Municipal Airport, the project site is not located within any of the safety zones established for the airport by the City of Petaluma. Thus, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project



area and a *less-than-significant* impact would occur. The project site is not located within a very high fire hazard severity zone. Furthermore, through compliance with the City's Emergency Operations Plan, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and the project would result in a *less-than-significant* impact.

- *Hydrology and Water Quality (Checklists Questions b and e)*: The Initial Study determined that because the proposed project is consistent with the site's General Plan land use designation and would comply with all applicable policies set forth by the City's General Plan, the project would not conflict with or obstruct implementation of the Petaluma Valley Groundwater Sustainability Agency (PVGSA) Groundwater Sustainability Plan (GSP). Furthermore, the Initial Study states that the City would have sufficient water supplies to serve demand within the City, including demand generated by the proposed project. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin or conflict with or obstruct implementation of the GSP, and a *less-than-significant* impact would occur.
- *Land Use and Planning (All Checklist Questions)*: The proposed project is consistent with the site's General Plan land use and zoning designations, and includes the development of pedestrian improvements that would be a continuation of the existing infrastructure. Thus, the proposed project would not physically divide an established community, and would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and a *less-than-significant* impact would occur.
- *Mineral Resources (All Checklist Questions)*: The City's General Plan planning area does not contain mineral resources that would be affected by development facilitated by buildout of the General Plan. Thus, the project site does not constitute a likely source of minerals that would be of value to the region or residents of the State. Because the proposed project would not result in the loss of availability of a known mineral resource or locally important recovery site, *no impact* would occur.
- *Noise (All Checklist Questions)*: The Initial Study determined that project operations would not result in significant noise impacts. However, the proposed project could generate a substantial temporary increase in ambient noise levels and groundborne vibration at noise-sensitive land uses in the vicinity of the project in excess of standards established by the City and County during construction activities. The Initial Study includes Mitigation Measure XIII-1, which would ensure compliance with the applicable standards during construction and operation of the proposed project. Furthermore, the Initial Study determined that the proposed project would be located outside of all noise impact zones associated with the Petaluma Municipal Airport, resulting in a *less-than-significant* impact regarding the potential exposure of people residing or working in the project area to excessive noise levels. Overall, the proposed project would result in noise and vibration impacts that would be *less-than-significant* or *less-than-significant with mitigation incorporated*.



- **Population and Housing (All Checklist Questions):** The proposed project is consistent with the General Plan land use and zoning designations for the project site; thus, development of the proposed project has been anticipated in the General Plan EIR, and the project would not induce substantial unplanned population growth either directly or indirectly, and a *less-than-significant* impact would occur. Although the proposed project would include the demolition of the on-site residence at 280 Casa Grande Road, the project would include a 0.637-acre Remainder that would not be a part of the proposed residential community; the purpose of the Remainder is to allow the property owner of 270 Casa Grande Road to retain their residence and continue to live on the property. In addition, while one existing residence would be removed, the proposed project would include the development of 59 additional dwelling units, thus bolstering the housing stock within the City. As such, the project would not displace a substantial number of existing housing or people and would not necessitate the construction of replacement housing elsewhere, and a *less-than-significant* impact would occur.

- **Public Services (All Checklist Questions):** The project would be required to comply with General Plan policies and pay development fees that support schools and emergency police and fire services. The proposed project would not directly result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, the proposed project would result in a *less-than-significant* impact with regard to public services.

- **Recreation (All Checklist Questions):** The Initial Study determined that through the payment of applicable in-lieu fees, any increase in the use of existing parks and recreational facilities resulting from a population increase induced by the proposed project would be *less-than-significant*.

- **Tribal Cultural Resources (All Checklist Questions):** The CRS prepared for the proposed project determined that the project site does not contain any recorded archeological resources. However, based on AB 52 consultation with the Federated Indians of Graton Rancheria (FIGR), the possibility exists that construction of the proposed project could result in a substantial adverse change in the significance of a tribal cultural resource. The Initial Study determined that implementation of Mitigation Measure XVIII-1 would reduce potential impacts related to tribal cultural resources to a *less-than-significant* level. Subsequent to finalizing the Initial Study, through further AB 52 consultation efforts, FIGR requested that additional analysis be completed. As such, an Extended Phase 1 (XPI) Archeological Study was performed for the project site. The XPI Archeological Study included the excavation of 10 test pits and inspection of soils for evidence of archeological and tribal cultural resources. Seven historic period artifacts were observed in three test pits and one precontact artifact was observed on the ground surface; no precontact features, sites, or buried soils were encountered. The seven historic period artifacts were not found in concentration and are not representative of a historic-period archaeological site. As such, they do not constitute a resource type that would be eligible for listing on the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) or be considered a unique archaeological resource. Similarly, the precontact artifact observed on the surface was not found in association with any other precontact artifacts, features, sites, or buried soils, and does not constitute a resource



type that would be eligible for listing on the NRHP or the CRHR or be considered a unique archaeological resource. The City shared the findings of the XPI Archeological Study with FIGR, who requested that the EIR require preconstruction worker awareness training. Based on FIGR's request, an additional measure, Mitigation Measure XVIII-2, has been added to the EIR. Mitigation Measure XVIII-2 is included in Table 2-1, Summary of Impacts and Mitigation Measures, in Chapter 2, Executive Summary, of this EIR. Mitigation Measure XVIII-2 requires preconstruction training by a qualified archeologist for all construction workers and supervisory personnel, including the importance of the protection of significant archaeological and tribal cultural resources, as well as proper procedures to follow in the event that such resources are uncovered during construction activities.

- *Utilities and Service Systems (All Checklist Questions):* Water supply for the project site would be sourced from the Russian River Water System and occasionally supplemented with local groundwater. Although the City could experience a shortfall of water supply during single dry year scenarios from 2030 to 2045, the City's Water Shortage Contingency Plan (WSCP) contains the City's strategic plan in preparation for and response to water shortages, including the water shortage stages and associated actions that would be implemented in the event of a water supply shortage. Thus, adequate water supply exists to serve the proposed project. Given the project's consistency with the General Plan land use designation, buildout of the project site with residential uses was considered in the Urban Water Management Plan (UWMP) projections. Therefore, the proposed project would not require or result in the relocation of new water infrastructure, or result in insufficient water supplies to serve the project, existing water users, or future development.

The project would be provided sanitary sewer conveyance service by the City of Petaluma through new connections to the existing sewer main in Casa Grande Road. Pursuant to Petaluma Municipal Code (PMC) Section 19.32.020, the project would be subject to the City's Wastewater Capacity Fee, the revenues from which would help fund future construction of sanitary sewer facilities in the City's service area. In addition, based on the available capacity remaining at the City's treatment facility, the City's wastewater infrastructure and treatment facility are anticipated to be sufficient to accommodate the increased demand that would be generated by the project. Furthermore, because the proposed project would be consistent with the site's Medium Density Residential land use designation and would be consistent with applicable General Plan policies, the project would not result in impacts beyond those identified in the General Plan EIR, and a *less-than-significant* impact would occur.

With respect to the new storm drain infrastructure that would be implemented as part of the project, the project would include new on-site stormwater facilities to treat and hold back (i.e., "detain") stormwater runoff so that the amount of runoff from the developed site would not exceed the site's current runoff rates. The final drainage system design for the project would be subject to review and approval by Sonoma Water to confirm that the proposed drainage system for the project is consistent with applicable standards. Therefore, the project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and a *less-than-significant* impact would occur.



Electricity would be provided by Pacific Gas and Electric Company (PG&E) and Sonoma Clean Power, a community choice program provider that sells electricity generated from renewable energy sources that is then delivered through PG&E's grid. Internet and telephone services would be provided by Comcast Xfinity or a similar service provider operating within the City. The project would not require major upgrades to, or extension of, existing infrastructure. Thus, impacts to electricity and telecommunications infrastructure would be *less than significant*.

Solid waste disposal services are provided to the City of Petaluma by Recology Sonoma Marin, a private company under contract with the City. Solid waste is disposed of at the Central Landfill, located at 500 Meham Road. The Initial Study determined that the Central Landfill has adequate available capacity to accommodate solid waste generated by the proposed dwelling units. Furthermore, the City's General Plan EIR evaluated the potential for development facilitated by buildout of the General Plan planning area, including the project site, to result in increased demand for solid waste disposal and concluded that through compliance with applicable General Policies, a less-than-significant impact would occur. Given that the project is consistent with the site's General Plan land use designation and would comply with applicable policies set forth in the General Plan, the project would not 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 a *less-than-significant* impact would occur.

- *Wildfire (All Checklist Questions)*: According to the CAL FIRE's Fire and Resource Assessment Program, the proposed project is located within a Local Responsibility Area (LRA) that is not designated as a Very High Fire Hazard Severity Zone (FHSZ). In addition, the project site is not located on a substantial slope. Use of construction equipment can result in sparks that could ignite grassland fires; however, construction equipment would include spark arrestors or guards, as appropriate and applicable. Furthermore, wildfire risks would not be anticipated to be exacerbated during project operation, as residential uses typically do not involve operational components that would increase the risk of wildfire. The project would be required to be designed in compliance with the California Fire Code, California Building Code, and the California Strategic Fire Plan. Thus, a *less-than-significant* impact would occur.

4.0.4 ENVIRONMENTAL ISSUES ADDRESSED IN THIS EIR

The EIR provides the analysis necessary to address the technical environmental impacts of the proposed project. The following environmental issues are addressed in this EIR:

- Biological Resources;
- Greenhouse Gas Emissions;
- Hydrology and Water Quality; and
- Transportation.

See Chapter 5, Section 5.3, for additional information on the scope of the cumulative impact analysis for each environmental issue addressed in the EIR.

4.0.5 CHAPTER FORMAT

Each technical chapter addressing a specific environmental issue begins with an **introduction** describing the purpose of the section. The introduction is followed by a description of the project's



existing environmental setting as the setting pertains to that particular issue. The setting description is followed by the **regulatory context** and the **impacts and mitigation measures** discussion, which contains the **standards of significance**, followed by the **method of analysis**. The **impact and mitigation** discussion includes impact statements prefaced by a number in bold-faced type (for both project-level and cumulative analyses). An explanation of each impact and an analysis of the impact's significance follow each impact statement. All mitigation measures pertinent to each individual impact follow directly after the impact statement (see below). The degree of relief provided by identified mitigation measures is also evaluated. An example of the format is shown below.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts is based on the implementation of the proposed project in comparison with the standards of significance.

4.x-1 Statement of Project-Specific Impact

Discussion of impact for the proposed project in paragraph format.

Statement of **level of significance** of impact prior to mitigation is included at the end of each impact discussion. The following levels of significance are used in the EIR: less than significant, significant, or significant and unavoidable. If an impact is determined to be significant, mitigation will be included in order to reduce the specific impact. Impacts that cannot be reduced to a less-than-significant level with implementation of all feasible mitigation would be considered to remain significant and unavoidable.

Mitigation Measure(s)

Statement of *level of significance* after the mitigation is included immediately preceding mitigation measures.

4.x-1(a) *Required mitigation measure(s) presented in italics and listed in consecutive order.*

4.x-1(b) *Required additional mitigation measure, if necessary.*

Cumulative Impacts and Mitigation Measures

The following discussion of cumulative impacts is based on implementation of the proposed project in combination with cumulative development within the applicable area or region.

4.x-2 Statement of Cumulative Impact

Discussion of cumulative impacts for the proposed project in paragraph format.

As discussed in detail in Chapter 5, Statutorily Required Sections, of the EIR, the cumulative setting for the proposed project is generally considered to be development anticipated to occur upon buildout of the project, as well as buildout of a number of approved or reasonably foreseeable projects within the City of Petaluma.



Statement of **level of significance** of cumulative impact prior to mitigation is included at the end of each impact discussion. The following levels of significance are used in the EIR for cumulative impacts: less than significant, less than cumulatively considerable, cumulatively considerable, or significant and unavoidable. If an impact is determined to be cumulatively considerable, mitigation will be included in order to reduce the specific impact. Impacts that cannot be reduced to a less than cumulatively considerable level with the implementation of all feasible mitigation would be considered to remain significant and unavoidable.

Mitigation Measure(s)

Statement of *level of significance* after the mitigation is included immediately preceding mitigation measures.

4.x-2(a) *Required mitigation measure(s) presented in italics and listed in consecutive order.*

4.x-2(b) *Required additional mitigation measure, if necessary.*

