

4 ENVIRONMENTAL EVALUATION

This chapter consists of 14 sections that evaluate the environmental impacts of the proposed East Washington Place project. In accordance with Appendix G of the CEQA Guidelines, the potential environmental effects of the proposed project are analyzed for the following environmental issue areas:

- ◆ Aesthetics
- ◆ Agricultural Resources
- ◆ Air Quality
- ◆ Biological Resources
- ◆ Cultural Resources
- ◆ Geology and Soils
- ◆ Hazards and Hazardous Materials
- ◆ Hydrology and Water Quality
- ◆ Land Use
- ◆ Noise
- ◆ Population, Housing and Urban Decay
- ◆ Public Services
- ◆ Transportation
- ◆ Utilities

A. *Format of the Environmental Evaluation*

Each section in Chapter 4.0 generally follows the same format and consists of the following subsections:

- ◆ The *Regulatory Framework* subsection contains an overview of the federal, State and local laws and regulations applicable to each environmental review topic. For each topic, policies have been included from both the existing General Plan and the proposed 2025 General Plan. Although the 2025 General Plan, released for public review in July 2006, has not yet been adopted by the City, it represents the most current information in terms of the City's policy direction on the issues evaluated in this EIR.
- ◆ The *Existing Conditions* subsection describes current conditions with regard to the environmental factor reviewed. The CEQA Guidelines call

for the identification of a temporal ‘baseline’ on which existing conditions are based. For this EIR, the Notice of Preparation (NOP) date (May 11, 2005) serves as the temporal basis for identifying existing conditions. In cases where there has been a relevant change to the site conditions that could affect the analysis of a particular topic, the change has been appropriately discussed in the *Existing Conditions* sub-section for that topic.

- ◆ The *Standards of Significance* subsection tells how an impact is judged to be significant in this EIR. These standards are based on the CEQA Guidelines and other regulatory criteria where noted.
- ◆ The *Impact Discussion* gives an overview of potential impacts of the project and tells why impacts were found to be significant or less than significant. For these analyses, 2010 was assumed to be the year in which the project would be fully operational, including both retail and residential. With the exception of air quality, the impact discussion does not include a year-by-year analysis as the residential units are phased in. The air quality section includes an interim-year sensitivity analysis for reasons explained in Section 4.3 (Air Quality).

Although not yet adopted, the proposed 2025 General Plan was reviewed to determine whether its implementation would change the conclusions of the impact analyses set forth in this EIR. Specifically, the 2025 General Plan was reviewed to assess whether its implementation would result in any new significant project-specific impacts, above and beyond those already identified in this EIR. A discussion of whether new impacts were identified is included in the *Impact Discussion* of each chapter.

The *Impacts and Mitigation Measures* section numbers and lists identified impacts and identifies measures that would mitigate each impact, where such measures are available. In Sections 4.1 through 4.14, each numbered impact is considered significant prior to mitigation, unless it is specifically identified as less than significant. Where feasible, mitigation measures have been suggested that would reduce significant impacts to less than significant levels. Impacts

would be less than significant after mitigation unless they are noted as significant and unavoidable in the text.

All mitigation measures are stated with conditional language (“should”) because they are recommendations, and not conditions of approval for the project, unless they are specifically adopted as conditions by the City. Under CEQA, an EIR is required to identify mitigation measures that could reduce identified impacts to less-than-significant levels. However, the City is not required to adopt these mitigation measures, even after the EIR is certified. The City could also require alternative mitigation measures that are equally effective, or it could find that the identified measures are infeasible and allow the project without mitigation under a finding of overriding consideration. If the City adopts the suggested mitigation measures as conditions of approval, then their language will be changed from the conditional “should” to the mandatory “shall.”

B. Cumulative Impact Analysis

Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR together with other reasonably foreseeable projects causing related impacts.

Where the incremental effect of a project is not “cumulatively considerable,” a lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. Where the cumulative impact caused by the project's incremental effect and the effects of other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant. The results of the cumulative impact analysis are presented in each Impact Discussion section in Sections 4.1 through 4.14.

1. Geographic Area for Cumulative Analysis

Individual cumulative impacts may occur over different geographic areas. The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing aesthetic impacts, only development within the vicinity of the project would contribute to a cumulative visual effect. In assessing air quality impacts, on the other hand, all development within the air basin contributes to regional emissions of criteria pollutants, and basinwide projections of emissions is the best tool for determining the cumulative effect. For most resource issues, the cumulative context evaluated in this EIR is the City of Petaluma.

2. Cumulative Projects Considered

The CEQA Guidelines provide two approaches to analyzing cumulative impacts. The first is the “list approach,” which requires a listing of past, present, and reasonably anticipated future projects producing related or cumulative impacts. The second is the summary approach wherein the relevant projections contained in an adopted general plan or related planning document that is designed to evaluate regional or areawide conditions are summarized. A reasonable combination of the two approaches may also be used.

The cumulative analyses in this EIR, which are included in Sections 4.1 through 4.14, use a “list approach.” The analyses consider specific development projects that are listed on the City’s list of pending development proposals or that were under construction at the time of the preparation of this EIR.

The base-year for the cumulative analysis is 2010, which assumes that the proposed project and the cumulative projects (Appendix C) will be fully constructed and operational. In the case of the traffic analysis (Section 4.13), 2010 is the base-year for the cumulative analysis, however as is typical of traffic impact analyses, conditions have also been evaluated and impacts identified for the General Plan buildout year (2025).