

## 6.0 OTHER CEQA CONSIDERATIONS

---

### 6.1 INTRODUCTION

Sections 15126 and 15128 of the *2019 California Environmental Quality Act (CEQA) Statutes and Guidelines* state that an EIR must include a discussion of the following topics:

- Significant environmental effects which cannot be avoided if the proposed project is implemented
- Significant irreversible environmental changes which would be involved in the proposed project should it be implemented.
- Growth-inducing impacts of the proposed project
- A brief statement of the reasons why certain possible effects of a project have been determined not to be significant and therefore, are not evaluated in the Environmental Impact Report (EIR)
- A brief discussion of Mandatory Findings of Significance

The following sections address each of these types of impacts based on the analyses included in **Section 4.0, Environmental Impact Analysis**.

### 6.2 SIGNIFICANT UNAVOIDABLE EFFECTS

This section identifies significant impacts associated with the implementation of the proposed project that cannot be mitigated to a less-than-significant level. As part of the certification process, the City Council will make a final decision as to the significance of impacts and the feasibility of mitigation measures in this Revised Draft EIR (RDEIR). As detailed in **Section 4.0**, implementation of the proposed project would result in the following significant impacts that would not be mitigated to a less-than-significant level:

<b>Impact TRANS-1</b>	<b>Development of the proposed project would generate VMT per capita greater than the project threshold.</b>
<b>Cumulative Impact TRANS-1</b>	<b>Development of the proposed project and the regional park trail project would generate VMT per capita greater than the project threshold under cumulative conditions.</b>

### 6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the *2019 State CEQA Guidelines* states that an EIR must include a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Generally, a project would result in significant irreversible environmental changes if:

- the primary and secondary impacts would generally commit future generations to similar uses;
- the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy);
- the project would involve a large commitment of nonrenewable resources; or
- the project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.

### **6.3.1 Commit Future Generations to Similar Uses**

Implementation of the proposed project would require demolition of mobile home and the remnants of the farm house at the project site and would result in the construction of a Davidon (28-Lot) Residential Project component and a Putnam Park Extension Project component. The development would occur on a primarily undeveloped open space. Therefore, the proposed project would result in the commitment of the approximately 15-acre Davidon (28-Lot) Residential Project component of the project site to urban development, which would exclude other uses of the project site for the lifespan of the project. Restoration of the Davidon (28-lot) Residential Project component project site to pre-developed conditions would not be feasible given the level of disturbance required to construct single-family homes. The approximately 44-acre Putnam Park Extension Project component would consist of the loop trail, Barn Center and related facilities, the remainder of the Putnam Park Extension Project component would be dedicated to the Sonoma County Regional Parks and retained as open space and protected habitat. Therefore, other uses of the project site for the lifespan of the project would not be feasible.

### **6.3.2 Consumption of Natural Resources, including Non-renewable Resources**

The proposed project involves development of the Davidon (28-lot) Residential Project component and the Putnam Park Extension Project component. Development of the residential homes and some elements of the Putnam Park Extension Project component would require the consumption of renewable and non-renewable resources. However, a large portion of the project site south of Kelly Creek would remain undeveloped and natural resources such as trees and protected habitat would be preserved under the proposed project. The area south of Kelly Creek would also include pasture improvements and ephemeral drainages stabilization. There would be no electricity or natural gas use in the portion of the project site south of Kelly Creek. Overall, the proposed project would still commit the project site to a new type of land use and would involve an irreversible commitment to the use of renewable and non-renewable resources during the construction and operation phases.

Resources such as lumber and other forest products are generally considered renewable resources. Such resources would be replenished over the lifetime of the project. For example, lumber supplies are increased

as seedlings mature into trees. As such, the development of the project would not result in the irreversible commitment of renewable resources. Non-renewable resources, such as natural gas, petroleum based products, asphalt, petrochemical construction materials, steel, copper and other metals, etc., are considered to be resources that are only available in finite supply. The processes that created these resources occur over a long period of time. Therefore, the replacement of these materials would not likely occur over the lifetime of the project.

The State Department of Finance indicates that the population of Sonoma County is expected to increase by approximately 67,626 people (a 19 percent increase) between the years 2019 to 2040 (DOF 2019). This increase in population will directly result in the need for more retail, commercial, residential, and recreational facilities in order to provide the services associated with population growth of this magnitude, and this additional development would increase the demand for renewable and non-renewable resources in the County. If not consumed by the proposed project, these resources would likely be committed to other projects to meet the anticipated needs related to increases in population. Furthermore, the investment of resources in this project would be typical of the level of investment normally required for residential developments of this size.

### **6.3.3 Irreversible Damage from Environmental Accidents**

CEQA requires a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. As the Davidon (28-lot) Residential Project component and the Putnam Park Extension Project component, the proposed project does not involve a land use that requires the transport, storage or on-site use of hazardous materials which, if inadvertently released, could result in irreversible damage to the environment. Therefore, the proposed project would not have the potential for irreversible damage from environmental accidents.

## **6.4 GROWTH-INDUCING IMPACTS**

This section evaluates the potential for growth inducement as a result of implementation of the proposed project. Section 15126.2(e) of the *State CEQA Guidelines* requires that an EIR include a discussion of the potential for a proposed project to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The *State CEQA Guidelines* do not provide specific criteria for evaluating growth inducement and state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth inducement is generally not quantified, but is instead evaluated as either occurring or not occurring with implementation of a project. The identification of growth-inducing impacts is generally informational, and mitigation of growth inducement is not required under CEQA. It must be emphasized that the *State CEQA*

*Guidelines* require an EIR to “discuss the ways” that a project could be growth inducing and to, “discuss the characteristics of some projects that may encourage ... activities that could significantly affect the environment.” However, the *State CEQA Guidelines* do not require an EIR to predict or speculate specifically where such growth would occur, in what form it would occur, or when it would occur.

In general terms, a project may foster economic or population growth in a geographic area if it meets any one of the criteria that are identified below.

- I. The project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of new access to an area, or a change in zoning or general plan designation).
- II. Economic expansion, population growth, or the construction of additional housing occurs in the surrounding environment in response to the project, either directly or indirectly (e.g., changes in revenue base, employment expansion, etc.).
- III. Development or encroachment in an isolated or adjacent area of open space (being distinct from an “infill” type of project).

Should a project meet any one of these criteria, it can be considered growth inducing. An evaluation of the proposed project with regard to these growth-inducing criteria is provided below under **Sections 6.4.1** through **6.4.3** below.

The *State CEQA Guidelines* require that consideration also be given to potential impacts on community service facilities resulting from increases in population. **Section 4.0, Environmental Impact Analysis**, of this RDEIR addresses potential impacts on community service facilities (e.g., police, fire, water, wastewater, etc.) resulting from increases in the population on the project site.

## **I. Removal of an Impediment to Growth**

In general, growth in an area may result from the removal of physical impediments or restrictions to growth. In this context, physical growth impediments would include non-existent or inadequate access to an area, as well as the lack of essential public services and utilities. In addition to these physical impediments, regulatory legislation, such as land use ordinances and building codes, may restrict or deter growth and can be considered an impediment to growth.

All properties in the surrounding area are accessible via existing roadways including D Street and Windsor Drive. Therefore, implementation of the proposed project would not provide new access to an inaccessible area, and thus the project would not be construed as growth inducing with regards to access.

All utilities needed to serve development allowed by the proposed project would be extended into the main project site from existing utility mains and infrastructure already existing along Windsor Drive and D Street. As discussed in **Section 4.14**, wastewater infrastructure improvements would include extending the existing public sanitary sewer mains along Windsor Drive to serve the proposed residences at the project site. Sewer lines and other utilities would run to a stub out located near the service vehicle entrance to the barn center along D Street to facilitate the provision of wastewater to the Putnam Park Extension Project component. Furthermore, the 300-foot band along the southern boundary of the project site that is designated Urban Separator on the General Plan Land Use map would be part of the approximately 44 acres dedicated to the Sonoma County Regional Parks and retained as open space and protected habitat. Extension of utilities through the open space area would not be allowed. Therefore, the proposed project would not induce growth since it would not provide an essential public service or roadway access to a new area, and would not change the zoning or general plan designation of the project site to allow for growth

## **II. Population and Economic Growth**

The proposed project would result in a temporary increase in construction-related job opportunities in the local area. However, employment opportunities provided by construction would not likely result in household relocation by construction workers to the vicinity of the project area. Construction workers would likely be drawn from the labor force already residing in the City of Petaluma and the surrounding communities and the broader Bay Area region. Employment opportunities provided during the relatively short construction period would not constitute a substantial growth in employment.

The future residents on the project site could represent an addition to the region's labor force; however, it is not known to what extent people would move to the project site from other sites within the region, or would be new residents in the region. The number of employed residents on the project site would be small in relation to the regional work force.

Given that implementation of the proposed project would not result in a large increase in the population of the City of Petaluma, and that the City is mostly built out, the opportunities for growth are limited. The increase in population and economic growth associated with the proposed project would not contribute substantially to growth in the City of Petaluma.

## **III. Urbanization of Land in Isolated Localities (Leap-Frog Development)**

There are adjacent residential developments to the north, northwest, and east of the project site. The residential development proposed as part of the project would align with residential uses adjacent to the project site. A larger portion of the project site would be developed as a park extension and preserved as open space. The project site is located within an area designated as Very Low Density Residential. Given

this, implementation of the proposed project would not result in the urbanization of land in an isolated locality and would not be considered growth inducing based on this criterion.

## 6.5 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the *State CEQA Guidelines* requires an EIR to briefly describe any potential environmental effects that were determined not to be significant during the Initial Study and EIR scoping process and were, therefore, not discussed in detail in the EIR. A discussion of these less-than-significant effects of the proposed project on agricultural resources, hazards and hazardous materials, and minerals is presented in **Section 4.0, Environmental Impact Analysis**. Other impacts found to be less than significant in the RDEIR are discussed in detail in **Sections 4.1 through 4.15**, and summarized in **Section 2.0, Executive Summary**.

## 6.6 MANDATORY FINDINGS OF SIGNIFICANCE

The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur (Section 15065 of the *State CEQA Guidelines*):

- Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As discussed in **Section 4.3, Biological Resources**, project construction activities could affect special-status wildlife species, and nesting birds. However, mitigation measures are proposed which would reduce the impact to a less-than-significant level. Therefore, the project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal species. As analyzed in **Section 4.4, Cultural Resources and Tribal Cultural**, and **Section 4.6, Geology and Soils**, the project could impact historical resources, disturb previously unknown archaeological resources, paleontological resources, or human remains. However, mitigation measures are proposed which would reduce impacts to a less than significant level and the proposed project would not eliminate important examples of the major periods of California history or prehistory.

- Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?

Cumulative impacts are evaluated at the end of each resource topic in this RDEIR. As the analysis shows, the proposed project would not result in significant cumulative impacts for any of the resource topics except Transportation. As discussed in **Section 4.13, Transportation**, development of the proposed project and the regional park trail project would generate VMT per capita greater than the project threshold under cumulative conditions.

- Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

As shown by the analysis in this RDEIR, the proposed project would have a less than significant impact or less than significant impact with incorporation of mitigation measures for all resource topics except for VMT under transportation impacts. Mitigation measures detailed in **Section 4.2 Air Quality**, **Section 4.7 Greenhouse Gas Emissions**, and **Section 4.10, Noise**, include measures to reduce the impact on construction phase impacts to nearby receptors. As detailed in **Section 4.13, Transportation**, there are few, if any, feasible strategies for reducing project-generated VMT due to the location and characteristics of the proposed project and project site. However, there are measures proven effective at reducing VMT for people living, working, and visiting in other areas of Petaluma. The proposed project would help the City and State meet their GHG goals by contributing to measures consistent with these strategies elsewhere in the City (**Mitigation Measure TRANS-1**). This concept could include VMT impact fees, VMT mitigation exchange, and VMT mitigation bank. As a component of the City of Petaluma’s on-going SB 743 implementation, the City is currently engaged in a process to develop a mitigation program that would address the transportation system impacts of discretionary projects, including those for which there is no feasible mitigation measure for VMT impacts. Implementation of **Mitigation Measure TRANS-1** would improve the attractiveness of transit service in Petaluma; however, the effect of this measure on reducing Citywide VMT is unknown. Therefore, this mitigation measure cannot guarantee that the impact of the proposed project on VMT would be reduced to a less-than-significant level. Although the level of reduction of this significant VMT impact is unknown, all possible measures would be taken to lessen the impact and reduce adverse direct or indirect effect to human beings.

## 6.7 REFERENCES

California Department of Finance. 2019. P-1 State and County Total Estimated and Projected Population for California and Counties, 2010-2060 (1-year increments). January.