

# Petaluma Housing Element 2023-2031

## Addendum for the 2015-2023 Housing Element Negative Declaration (SCH #2014102018)

*prepared by*

**City of Petaluma**  
Planning Division  
11 English Street  
Petaluma, California 94952  
Contact: Christina Paul, Principal Planner

*prepared with the assistance of*

**Rincon Consultants, Inc.**  
449 15th Street, Suite 303  
Oakland, California 94612

**January 2023**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

[rinconconsultants.com](http://rinconconsultants.com)



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# 1 Introduction and Project Summary

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## 1.1 Project Title

City of Petaluma Housing Element Update 2023-2031

## 1.2 Lead Agency Name and Address

City of Petaluma  
Planning Division  
11 English Street  
Petaluma, California 94952

## 1.3 Contact Person and Phone Number

Christina Paul, Principal Planner  
cpaul@cityofpetaluma.org  
707-778-4367

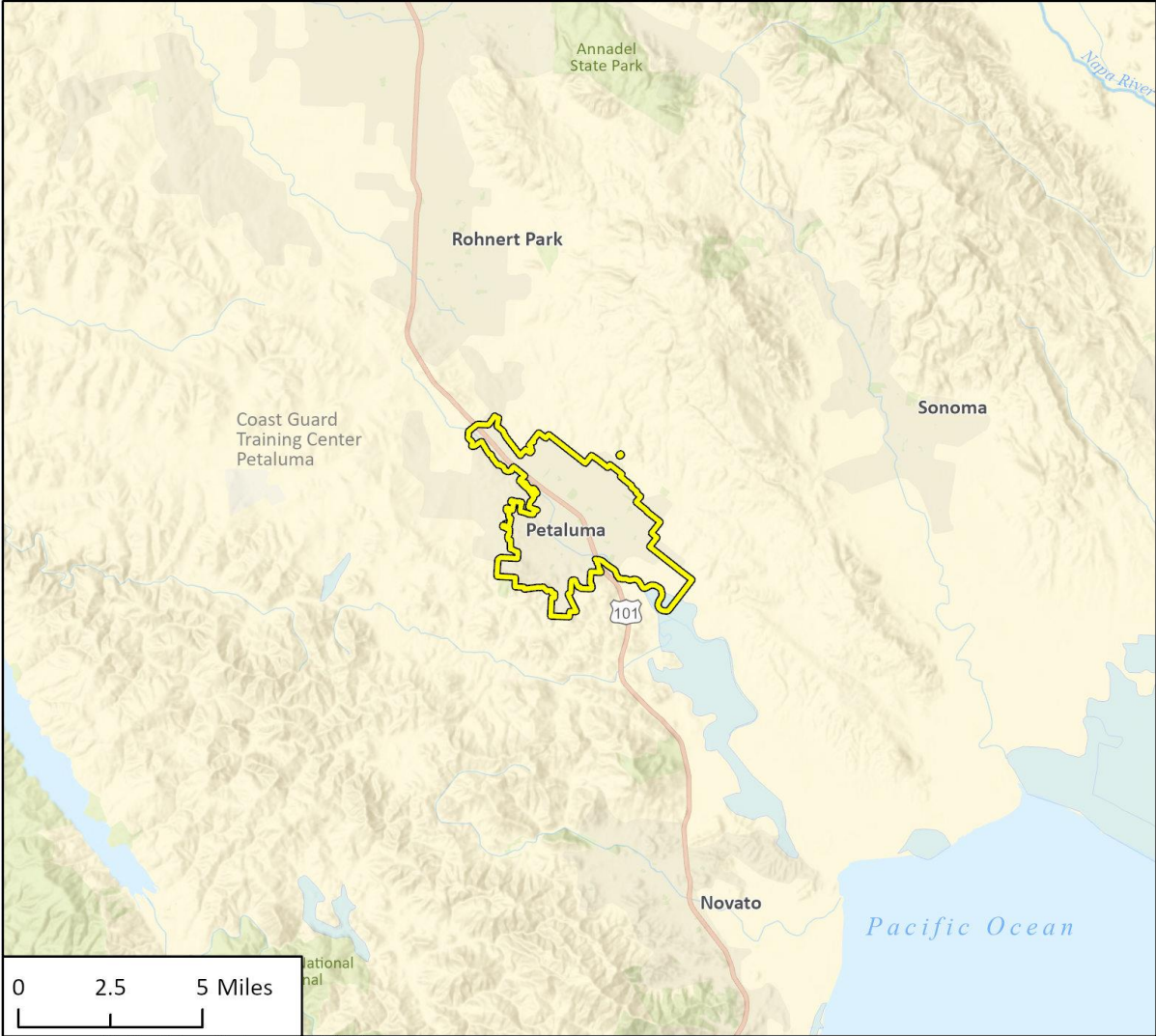
## 1.4 Project Location

The City of Petaluma (City) City limits and sphere of influence (SOI) encompass approximately 9,294 acres and are located in southern Sonoma County, approximately 16 miles east of the Pacific Ocean and 34 miles north of San Francisco. The City is located south of the City of Rohnert Park, east of the community of Tomales, and west of the City of Sonoma. The City is largely built out and is at the crossroads of two State Highways, Highways 116 and U.S. Route 101. The Housing Element Update's planning boundaries coincide with the Petaluma City limits, shown in Figure 1.

## 1.5 Project Sponsor's Name and Address

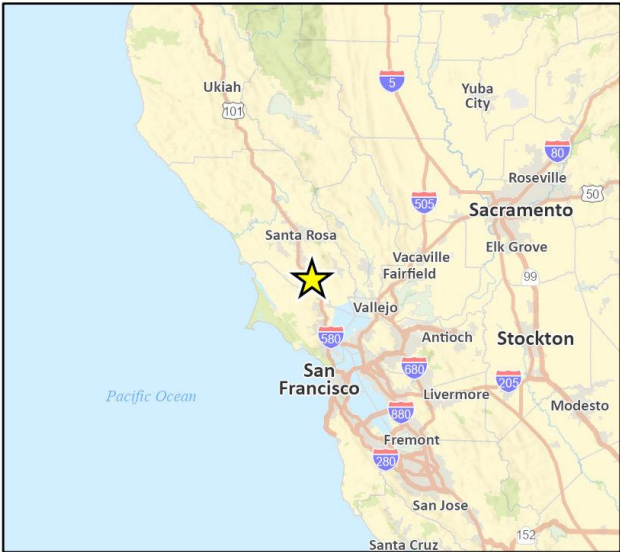
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Planning Division  
11 English Street  
Petaluma, California 94952

**Figure 1 Regional Project Location, Planning Boundaries**



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20-10614 EPS  
Fig 1 Regional Location



## 1.6 Project Description

The project consists of a comprehensive update to the City of Petaluma Housing Element (herein referred to as “Housing Element Update” or “project”). The City’s 2015-2023 (5th Cycle) Housing Element underwent environmental review in the form of an Initial Study – Negative Declaration Report (IS-ND), which was adopted on December 1, 2014 by the City Council (State Clearinghouse No. 2014012018).

State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The Housing Element Update identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups, defined under State law (California Government Code Section 65583). It analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons. The City of Petaluma Housing Element is being updated as part of the State’s 6th Cycle Regional Housing Needs Assessment (RHNA) allocation. For Petaluma, the 6<sup>th</sup> Cycle planning period runs from January 31, 2023 through January 31, 2031.

The project would bring the City’s Housing Element into compliance with State legislation passed since the publication of the previous (5th Cycle) Housing Element (adopted in 2014). The Housing Element Update includes a housing sites inventory (Section 3 of the Housing Element) that demonstrates how the City plans to meet its 6th Cycle RHNA allocation. However, no formal land use changes or physical development are proposed at the time of adoption of the Housing Element.

The Housing Element Update would not, in and of itself, result in environmental impacts, as it does not propose to develop any projects. Rather, it establishes objectives and policies designed to guide future development as the City works to achieve State-mandated housing goals. Future development would require project-specific developmental review as potential impacts are location-specific and cannot be assessed in a meaningful way until a project site and development proposal are identified. When a specific development proposal is considered for approval, that project would be subject to adopted development guidelines/standards and it must comply with the Housing Element Update. If a subsequent activity (in this case a specific development proposal) would have effects not identified in the IS-ND (the 2015-2023 5th Cycle Housing Element IS-ND, the General Plan EIR, and this Addendum), the lead agency must prepare additional CEQA documentation prior to project approval.

This Addendum, therefore, analyzes the changes and potential impacts related to the adoption of the proposed 6<sup>th</sup> Cycle Housing Element Update 2023-2031. No physical development or land use changes are addressed or evaluated. The City would analyze land use changes separately to demonstrate compliance with the requirements of CEQA, if necessary. This Addendum is intended to comply with the requirements of CEQA. In particular, and in line with Public Resources Code Section 21083.3, this Addendum Evaluation assesses whether the updated Housing Element, as a policy and programs document, includes impacts not addressed or analyzed as significant effects in the 5th Cycle Housing Element IS-ND.

## 1.7 Discretionary Action

Implementation of the Housing Element would require the following discretionary actions by the City of Petaluma Planning Commission/City Council:

- Approval of a General Plan Amendment to incorporate the 2023-2031 Housing Element Update

The California Department of Housing and Community Development (HCD) reviews and determines whether the proposed Housing Element complies with State law. Aside from HCD, no other approvals by outside public agencies are required.

## 1.8 Prior Environmental Document(s)

City of Petaluma, General Plan 2025 Environmental Impact Report. State Clearinghouse Number 2004082065, certified May 2008.

City of Petaluma, 2015-2023 Housing Element Initial Study – Negative Declaration (5th Cycle Housing Element IS-ND). State Clearinghouse Number 2014062067, adopted December 2014.

## 1.9 Location of Prior Environmental Document(s)

City of Petaluma, 2015-2023 Housing Element IS-ND, Planning Division website:

<https://drive.google.com/file/d/1dAGACBC6xUSiR4Q8xUH5PXaitxIh0tKE/view?usp=sharing>

City of Petaluma, General Plan EIR, Planning Division website:

<https://cityofpetaluma.org/general-plan/>

## 2 Project Context

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The California Legislature has identified the attainment of a decent home and suitable living environment for every resident as the State's major housing goal. Recognizing the important role of local planning programs in pursuing this goal, the legislature mandated that all cities and counties prepare a housing element as part of their comprehensive general plans. Government Code Sections 65580 to 65589.8 set forth the specific components to be contained in a community's housing element.

### 2.1 Purpose of the Housing Element

The Housing Element of the General Plan is designed to provide the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. A priority of both State and local governments, Government Code Section 65580 states that "the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian family is a priority of the highest order."

Pursuant to the State law, the Housing Element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs
2. To provide a strategy that establishes housing goals, policies, and programs.

The Housing Element is one of the eight General Plan elements the State mandates in Government Code Section 65302. The Housing Element serves as an integrated part of the General Plan but is updated more frequently to ensure its relevancy and accuracy. The Housing Element identifies strategies and programs that focus on:

1. Conserving and improving existing affordable housing
2. Maximizing housing opportunities throughout the community
3. Assisting in the provision of affordable housing
4. Removing governmental and other constraints to housing investment
5. Promoting fair and equal housing opportunities.

The residential character of Petaluma is largely determined by the variety, location, and maintenance of its housing. The Housing Element is an official response to the need to provide housing for all economic segments of the population, establishing goals, policies, and programs that will guide City decision making and set forth an action plan to implement these housing programs through an established planning period.

### 2.2 Regional Housing Needs Allocation

The RHNA reflects the California Department of Housing and Community Development's determination of the projected housing needs in a region by household income level as a percent of the Area Median Income (AMI). The Association of Bay Area Governments (ABAG) was tasked with

allocating this regional housing need among the jurisdictions in the ABAG region, which includes Sonoma County. Table 1 shows the breakdown of the RHNA for Petaluma during the 2023-2031 planning period, during the 6th Cycle.

**Table 1 2023-2031 Regional Housing Need Allocation**

<b>Petaluma</b>	<b>Extremely Low/Very Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>Total</b>
RHNA	499	288	313	810	1,910
<b>% of Total</b>	<b>26%</b>	<b>15%</b>	<b>16%</b>	<b>42%</b>	<b>100%</b>

AMI = Area Median Income (established annually by the Department of Housing and Urban Development)

Source: ABAG 2022

The City had 24,135 households as of January 2022 (California Department of Finance [DOF] 2022). As of 2022, 77.9 percent were single-family units, which included 70.3 percent single-family detached units and 7.6 percent single-family attached units; 18.9 percent were multi-family dwelling units; and the remaining 3.2 percent were mobile homes (DOF 2022).

## 2.3 Changes in State Law

The following items represent substantive changes to State housing law since the City's last Housing Element was adopted and certified in 2014. The Housing Element Update has incorporated and addressed all pertinent housing law changes.

- Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017) and AB 168 (2020)
- Additional Housing Element Sites Analysis Requirements: Assembly Bill 879 (2017) and Assembly Bill 1397 (2017)
- Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017)
- No-Net-Loss Zoning: Senate Bill 166 (2017)
- Safety Element to Address Adaptation and Resiliency: Senate Bill 1035 (2018)
- By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018) and Assembly Bill 101 (2019)
- Accessory Dwelling Units: Assembly Bill 2299 (2016), Senate Bill 1069 (2016), Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly Bill 587 (2019), Senate Bill 13 (2019), and Assembly Bill 671 (2019)
- Density Bonus: Assembly Bill 1763 (2019)
- Housing Crisis Act of 2019: Senate Bill 330
- Surplus Land Act Amendments: Assembly Bill 1486 and AB 1255 (2019)
- Housing Impact Fee Data: Assembly Bill 1483 (2019)
- Emergency and Transitional Housing Act of 2019: Assembly Bill 139 (2019)
- Standardization of Sites Inventory Analysis and Reporting: Senate Bill 6 (2019)
- Evacuation Routes: Senate Bill 99 and AB 747 (2019)
- Tenant Protection: AB 1482 (2019)

## 2.4 City of Petaluma General Plan

State law mandates that each city and county in California adopt “a comprehensive, long-term general plan,” the purpose of which is to plan for important community issues such as new growth, housing needs, and environmental protection. Furthermore, the General Plan is used to project future demand for services such as sewer, water, roadways, parks, and emergency services.

The Petaluma General Plan, adopted in May 2008, is a long-term document with text and diagrams that express the goals, objectives, and policies necessary to guide the community toward achieving its vision over a 17-year period (2008 to 2025). A General Plan reflects the priorities and values of the community.

City decision-makers (e.g., City Council and Planning Commission), rely on the General Plan as the basis for making decisions on matters such as land use, and the provision of public facilities (e.g., roads, parks, fire stations). It is also a policy document that guides decisions related to protecting, enhancing, and providing open space, habitat conservation, arts and recreation programming, and community character.

State law requires that every General Plan, at a minimum, address certain subject categories (called “elements”), which include land use, circulation, housing, conservation of natural resources, environmental justice, open space, noise, and safety. A General Plan may also address other subjects that are of importance to the community” future, such as sustainability, community design, and public art. Petaluma’s General Plan includes the following elements:

- Land Use, Growth Management, and the Built Environment
- Community Design, Character, and Green Building
- Historic Preservation
- The Natural Environment
- Mobility
- Recreation, Music, Parks, & the Arts
- Community Facilities, Services and Education
- Water Resources
- Economic Health & Sustainability
- Health & Safety
- Housing

The City of Petaluma is updating its General Plan, the road map that will shape the future of the City for the next 20 to 30 years. The current General Plan, for which an EIR was certified (SCH # 2004082065), is a comprehensive long-term plan for Petaluma that was adopted in 2008. Since 2021, the City has been moving ahead in the General Plan Update process through extensive community outreach and deep technical analysis. High priority concerns include availability and affordability of housing, climate change, public health, and sustainability. Although the current General Plan horizon year does not end until 2025, the City understands the benefits of working on the General Plan Update and the Housing Element in concurrent processes. Taking a proactive approach to updating the General Plan will position the City to adapt to significant changes in Housing Element Law and will ensure a comprehensive update that takes into consideration the many challenges surrounding housing in the city as well as other high-priority concerns.

## 2.5 Petaluma General 5th Cycle Housing Element IS-ND

The Petaluma 2015-2023 Housing Element Initial Study – Negative Declaration (herein called the 5th Cycle Housing Element IS-ND) addressed the potential environmental effects of the implementation of the 5th Cycle Housing Element. In addition, the 5th Cycle Housing Element IS-ND included the environmental effects, previously addressed in the General Plan EIR, of the planned buildout of the City of Petaluma through the year 2023 and concluded that implementation of the 5th Cycle Housing Element would result in either less than significant or no impact in all environmental issue areas. No mitigation measures were required in any issue area.

### City of Petaluma 5th Cycle Housing Element

The Housing Element has a planning horizon year of 2023, but it does not specify or anticipate exactly when buildout would occur, as long-range demographic and economic trends are difficult to predict. The designation of a site in the Housing Element for residential development does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as most development depends on property owner initiative.

As detailed in 5th Cycle Housing Element IS-ND, population growth estimates for the Housing Element were based on adjusted state projections. ABAG projects that Petaluma's population will continue to grow to 67,200 by 2040, which is an increase of 8,200 residents over the current population of 59,000. This was found in the 5th Cycle Housing Element IS-ND to be within the projected buildout capacity of the General Plan and its Environmental Impact Report (EIR), which assumed a buildout population of 72,707. The RHNA requirements for the 2015-2023 Housing Element are presented in Table 2.

**Table 2 2015-2023 Regional Housing Need Allocation**

Petaluma	Extremely Low/Very Low	Low	Moderate	Above Moderate	Total
RHNA	199	103	121	322	745
% of Total	27%	14%	16%	43%	100%

AMI = Area Median Income (established annually by the Department of Housing and Urban Development)

Source: Petaluma, City of. 2014.

## 2.6 Housing Element Update

The 2023-2031 Housing Element Update has the following major components:

- An **introduction** to review the overall Housing Element Update effort, a summary of housing needs and constraints, a Fair Housing summary, and a review of the effectiveness of the 2023 Housing Element and the City's progress in its implementation. (Section 1)
- The City's **Resources to Accomplish Goals** such as the City's fiscal resources and leveraging history, Article 34 authority, and the Regional Housing Needs Assessment. (Section 2)
- A detailed **Housing Action Plan** which outlines the goals, objectives, and policies of the 2023-2031 Housing Element Update, housing programs, and fair housing initiatives. (Section 3)

## Goals, Policies, and Programs

The primary objective of the Housing Element is to encourage the production of new housing units to meet the RHNA and housing for special needs populations. This is done by adopting a series of goals and policies that facilitate the development of all housing types, exploring innovative housing solutions, addressing the needs of the City's residents, and affirmatively furthering fair housing. The 2023-2031 Housing Element Update goals, policies, and programs are summarized below and referenced throughout this Addendum Evaluation as appropriate. Specific implementation actions of note include amendment of the ADU ordinance as necessary to comply with State law as described in Program 3: Accessory Dwelling Units; adoption of objective design standards and parking standards for multi-family residential and mixed-use development as described in Program 5: Flexible Development Standards; and developing application and process materials for SB 9 applications as described in Program 15: Workforce and Missing Middle Housing.

### *Housing Availability and Choices*

State law requires that the goals and policies of the housing element shall encourage and facilitate the production of a range in types of housing affordable to households of varied income levels. The City supports this goal by providing assistance programs, adequate siting, and a variety of housing types to meet the needs of each income category.

### *Development Constraints*

Development constraints such as application requirements, design and development standards, and the time and uncertainty associated with obtaining permits can affect the price and availability of housing. Input from stakeholders indicates that the City's approval processes could be streamlined to better facilitate development projects, and that continued learning opportunities are needed to decrease constraints and uncertainty related to implementation of new housing laws and programs.

The 2023-2031 Housing Element Update includes programs to help the City overcome these constraints. The strategies employed would help remove government constraints to accommodate special housing needs and expedite processing for affordable housing projects.

### *Affordable Housing*

Housing affordability can impede a person's ability to find a home and high housing costs present people with challenges in affording to meet their other essential needs. The City supports this goal by committing to expand revenue sources to provide affordable housing, partner with market-rate housing developers and other invested parties, streamline the review process for affordable housing developments, and evaluate City-owned parcels for affordable housing development.

### *Housing Preservation*

Safeguarding affordable housing is essential for maintaining access to vital opportunities. The loss of this housing has consequences for the communities that rely on affordable housing. Housing preservation is a less resource intensive and cost-effective way to ensure long-term affordability and availability of the housing stock.

### *Special Needs Housing*

Living without stable housing or housing that supports unique needs can worsen the health of residents and put those with special needs at a higher risk of becoming unhoused. Supportive

housing combines affordable housing with intensive coordinated services to help people struggling with chronic physical and mental health issues maintain stable housing and receive appropriate health care.

### *Fair Housing*

Equal access to housing for all is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. As defined in state and federal law, fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of protected status. Recognizing this fundamental right, the federal and State of California governments have both established fair housing as a right protected by law. The 2023-2031 Housing Element Update contains policies and programs that would ensure fair access to housing and services for all members of the community.

### 3 Overview of CEQA Guidelines Section 15164

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CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when a project has a previously certified EIR or adopted Negative Declaration (ND).

CEQA Guidelines Section 15164 states that a lead agency shall prepare an addendum to a previously certified EIR or adopted ND if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or ND are found. CEQA Guidelines sections 15162(a) states that no Subsequent or Supplemental EIR, or ND, shall be prepared for a project with a certified EIR or adopted ND unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that will require major revisions of the previous EIR or ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, or previous ND was adopted as complete, shows any of the following:
  - A. The project will have one or more significant effects not discussed in the previous EIR or ND.
  - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR or ND.
  - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
  - D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR or ND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The analysis pursuant to Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR or adopted ND, that an addendum to the existing EIR or ND would be appropriate, and no new environmental document, such as a new EIR or new ND, would be required. The addendum need not be circulated for public review but can be included in or attached to the final EIR or final ND, and the decision-making body shall consider the addendum with the final EIR or final ND prior to deciding on the project.

The City has prepared this Addendum Evaluation, pursuant to CEQA Guidelines Sections 15162 and 15164, to evaluate whether the project's environmental impacts are covered by and within the scope of the Petaluma 2015-2023 Housing Element IS-ND (December 2014, State Clearinghouse Number 2014102018).

The following Addendum Evaluation details any changes in the project, changes in circumstances under which the project is undertaken, and/or “new information of substantial importance” that may cause one or more effects to environmental resources.

The responses herein substantiate and support the City’s determination that the Housing Element Update policies and programs are within the scope of the Petaluma 2015-2023 Housing Element IS-ND, do not require subsequent action under CEQA Guidelines Section 15162 and, in conjunction with the IS-ND, adequately analyze potential environmental impacts.

## 4 Environmental Effects and Determination

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### 4.1 Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances, or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

■ None

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology and Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality   | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

### 4.2 Determination

Based on this analysis:

- ☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is “new information of substantial importance,” as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no “new information of substantial importance” as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted IS-ND is adequate and this evaluation serves as an ADDENDUM to the City of Petaluma, 2015-2023 Housing Element Initial Study – Negative Declaration (5th Cycle Housing Element IS-ND). State Clearinghouse Number 2014102018 certified December 2014.

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Signature

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Christina Paul

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Printed Name

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Date

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Principal Planner

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Title

## 5 Addendum Evaluation Methodology

### 5.1 Housing Element Update Consistency

#### Accommodation of the RHNA

Petaluma's RHNA for the current (2023-2031) planning period is 1,910 units, consisting of 499 very low-income housing units, 288 low-income housing units, 313 moderate-income housing units, and 810 above moderate-income housing units. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units. The Housing Element Update includes a housing plan that accommodates the RHNA plus a buffer of additional housing units as recommended by the HCD. To identify enough sites for each RHNA income level, the Housing Element includes an inventory of suitable sites for housing development. Table 3 shows the City's RHNA and capacity of Housing Opportunity Sites.

**Table 3 Summary of 2023-2031 RHNA Strategy**

		Very Low	Low	Moderate	Above Moderate	Total
<b>RHNA</b>		<b>499</b>	<b>288</b>	<b>313</b>	<b>810</b>	<b>1,910</b>
<b>Likely Sites</b>		<b>236</b>	<b>191</b>	<b>106</b>	<b>1,354</b>	
	Potential Accessory Dwelling Units (ADUs)	38	38	38	13	128
	Pipeline Projects	198	153	68	1,341	1,760
<b>Remaining RHNA</b>		<b>263</b>	<b>97</b>	<b>207</b>	<b>(544)</b>	<b>567</b>
<b>Opportunity Sites</b>		<b>214</b>	<b>215</b>	<b>358</b>	<b>566</b>	<b>1,353</b>
	Vacant Sites	37	37	44	220	338
	Parking Lots of Shopping Centers	10	11	-	221	242
	Underutilized Sites	167	167	314	125	773
<b>Total Capacity</b>		<b>450</b>	<b>406</b>	<b>464</b>	<b>1,920</b>	<b>3,241</b>
Percent Buffer (Remaining RHNA) <sup>1</sup>		+19%		+73%	N/A <sup>2</sup>	N/A

1. Buffer percentage was calculated by dividing the surplus/deficit by the remaining need.

2. There is no remaining need for Above Moderate units (RHNA was met with pipeline projects and potential ADUs).

Sources: City of Petaluma 2022

The Housing Element Update would be consistent with State requirements for the RHNA to plan adequately to meet existing and projected housing needs for all economic segments of the community. The Housing Element Update would also be submitted to HCD for review and approval to ensure that it would adequately address the housing needs and demands of the City.

A detailed discussion of the Housing Element Update development assumptions and housing plan is provided below.

### *Housing Element Update Plan and Assumptions*

The City would meet its RHNA through accessory dwelling unit (ADU) development projections; credits toward RHNA (Pipeline Projects); and adequate sites identified in the Sites Inventory, including sites on vacant and non-vacant land.

### **ADUs**

State law allows jurisdictions to project the number of ADUs to be constructed over eight years based on the recent trend of ADU construction. ABAG prepared a rent study that received preliminary approval from HCD. Based on a survey of rental listings for ADUs and similar units, ABAG established an income/affordability distribution for ADUs at 30 percent very low income, 30 percent low income, 30 percent moderate income, and 10 percent above moderate income.

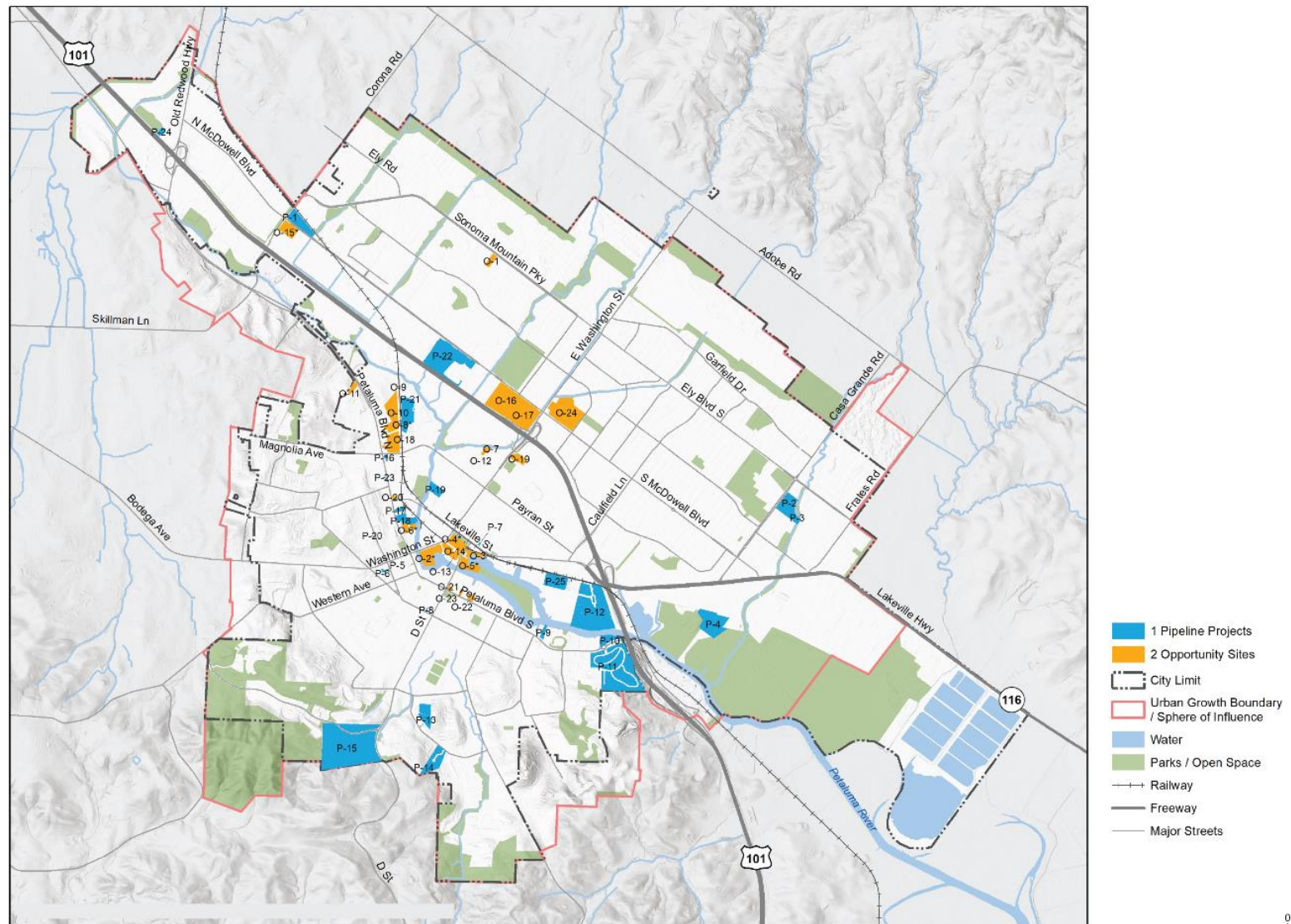
### **CREDITS TOWARD RHNA (PIPELINE PROJECTS)**

While the new 6<sup>th</sup> Cycle Housing Element begins January 31, 2023, the baseline project period for the RHNA begins on June 30, 2022. Housing units under construction, approved, entitled, or permitted but not expected to be finalized until after June 30, 2022 can be credited toward the 6th Cycle RHNA.

### **HOUSING OPPORTUNITY SITES**

Accounting for projected ADUs and eligible credits, the City must identify adequate sites to fully accommodate the remaining RHNA obligations. Opportunity sites are sites that are currently zoned for residential or mixed-use development, where existing uses on site are considered underutilized with potential for redevelopment. Sites with expressed interests for redevelopment from property owners and developments are also included. In Petaluma, these sites include vacant and underutilized sites, as well as parking lots of shopping centers. Some underutilized shopping centers in the city are zoned to allow residential uses and have large surface parking lots that can accommodate new housing with no displacement of existing uses, and are therefore included as opportunity sites. Figure 2 shows the location of Housing Opportunity Sites throughout the city.

### Figure 2 Housing Opportunity Sites



nty of Sonoma(2021); ESRI (2021).

## 5.2 Housing Element Buildout Comparison

As shown in Table 4, the buildout of the City’s 5th Cycle Housing Element sites inventory consisted of 2,136 units across varying income levels. The City’s 6th Cycle Housing Element Buildout was determined to be its sites inventory capacity of 3,257, which constitutes a 1,105-unit net increase between the 5th and 6th Cycles. The buildout capacities of each Cycle include both its RHNA and a buffer and demonstrate the City’s realistic housing capacity. Buffers are recommended by HCD and provide assurance that Petaluma has adequate sites to meet the RHNA.

**Table 4 Comparison of 5th and 6th Cycle Housing Element Buildout**

	Very Low	Low	Moderate	Above Moderate	Total
5th Cycle Sites Inventory	500	232	273	1,131	2,136
6th Cycle Sites Inventory	450	406	464	1,920	3,241
<b>Net Increase</b>	<b>-50</b>	<b>174</b>	<b>191</b>	<b>789</b>	<b>1,105</b>

As shown in Table 4 , there would be a net increase of 1,105 units under the full buildout of the 6th Cycle Housing Element compared to the 5th Cycle Housing Element. The Department of Finance (DOF) estimates there are 2.50 people per household in Petaluma (DOF 2022). Using this metric, it can be determined that the 5th Cycle Housing Element would add up to an estimated 5,340 residents to the city. The 6th Cycle Housing Element would add up to an estimated 8,103 residents. The 6th Cycle Housing Element, therefore, constitutes a net population increase of 2,763 residents between the 5th and 6th Cycle Housing Elements. However, it is important to note that, as described in Section 2.4, the projected population buildout analyzed in the General Plan EIR is a total of 72,707 people, which accounted for a population increase of 15,600 people. Therefore, the population increase of 8,104 residents associated with the 6th Cycle Housing Element would bring the total population to 67,104. This is within the buildout projections analyzed in the General Plan EIR and is consistent with the methodology used for analysis in the 5th Cycle Housing Element IS-ND.

## 5.3 Preliminary Environmental Constraints

State housing law requires the City to review both governmental and non-governmental constraints to the maintenance and production of housing for all income levels. Since local governmental actions can restrict the development and increase the cost of housing, State law requires the Housing Element to “address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing” (Government Code Section 65583(c)(3)).

Several factors can constrain residential development. These include market constraints, such as development costs and interest rates, and governmental constraints, which include land use controls, fees, processing times, and development standards, among others. In addition, environmental and infrastructure constraints can also impede residential development. For purposes of the Addendum Evaluation, only the potential environmental constraints, as they relate to CEQA, were evaluated.

Environmental constraints to residential development typically relate to the presence of sensitive habitat, flooding, topography, and other natural and physical characteristics that can limit the amount of development in an area or increase the cost of development. The Housing Element Update, in and of

itself, does not propose specific development projects, but rather puts forth goals, policies, and programs that support housing efforts in Petaluma, consistent with the General Plan.

## 6 Addendum Evaluation

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### 6.1 Aesthetics

#### 5th Cycle Housing Element IS-ND Aesthetics Findings

The 5th Cycle Housing Element IS-ND determined that there would be no impact to visual character, including scenic vistas or scenic resources. The 5th Cycle Housing Element IS-ND determined that the 2015- 2023 Housing Element update implements the General Plan. Impacts from future growth were previously identified in the General Plan EIR. Future development would be required to be consistent with existing adopted General Plan policies that protect the scenic resources of the City of Petaluma. The IS-ND also determined that prior to approval of any new projects within the city that would require a Conditional Use Permit or Design Review approval, those projects would undergo project-specific environmental review consistent with Petaluma's Zoning Ordinance in order to reduce impacts related to substantial light and glare. In addition, any proposed project would have to conform to any applicable design standards and any adopted local or State codes that regulate public health and safety such as the Uniform Building, Plumbing, Electrical, or Mechanical Codes. Therefore, there were no impacts to aesthetics.

#### Addendum Analysis

Similar to the 5th Cycle Housing Element, the 6th Cycle Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to scenic vistas, scenic resources, or visual character, and would not create new sources of substantial light or glare which adversely affects views.

All future development would be subject to adopted development guidelines, including standards that govern visual quality and community design. Specifically, future development would be required to comply with policies and actions from the Petaluma General Plan.

#### Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. Therefore the Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the 6th Cycle Housing Element Update and no additional environmental assessment of aesthetics is required.

## 6.2 Agriculture and Forestry Services

### **5th Cycle Housing Element IS-ND Agriculture and Forestry Resources Findings**

The 5th Cycle Housing Element IS-ND identified that Petaluma has agricultural lands in the northern tip of the city which make up less than one percent of the land in the Petaluma Growth Boundary. The IS-ND concluded that impacts to agricultural resources from future growth was analyzed in the General Plan EIR. Sites for future development were identified to mostly be on urban infill land designated for residential uses.

The 5th Cycle Housing Element IS-ND determined that no parcels within the city are under a Williamson Act Contract. Therefore, implementation of the Housing Element would have no impact on land with existing zoning for agricultural use or under a Williamson Contract. There are no forest lands, timber lands or parcels zoned as forest land, timber, or timber production located within the Petaluma Planning Area. Therefore, the IS-ND concluded that implementation of the 5<sup>th</sup> Cycle Housing Element would have no impact on agricultural resources, forest land, timber, or timber production. There was no need for mitigation measures in the 5th Cycle Housing Element IS-ND.

### **Addendum Analysis**

The proposed 6<sup>th</sup> Cycle Housing Element goals and policies aim to focus new growth and development at infill locations and to protect open space areas and agricultural lands.

Similar to the 5th Cycle Housing Element, the proposed Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to farmland.

All future development would be subject to adopted development guidelines and would be required to comply with policies and actions from the Petaluma General Plan.

### **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the 5th Cycle Housing Element IS-ND. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of agriculture and forestry resources is required.

## 6.3 Air Quality

### **5th Cycle Housing Element IS-ND Air Quality Findings**

The City of Petaluma is within the Bay Area Air Basin, which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). In 2010, BAAQMD adopted the Bay Area Clean Air Plan, which presents control measures to attain air quality standards, reduce GHG emissions, and protect public health. The Petaluma General Plan is consistent with the 2010 Clean Air Plan and contains policies that are applicable to the Housing Element. Air Quality impacts due to population growth were addressed in the Petaluma General Plan EIR and the IS-ND found there were no impacts beyond what was already analyzed. The 5th Cycle Housing Element IS-ND determined that the Housing Element update would not propose any additional development not anticipated by the 2008 General Plan. Adopting the Housing Element would not by itself violate any air quality standard or result in a cumulatively considerable net increase of any criteria pollutant. The 5th Cycle Housing Element Update has identified sites in the planning area where infill could occur, but does not propose any site-specific new development. The 5th Cycle Housing Element IS-ND determined that depending on the attributes of each individual development proposal, future development would be subject to additional environmental review and compliance with all applicable policies related to air quality, pollutant concentrations, and sensitive receptor exposure. The 5th Cycle Housing Element IS-ND found that the Housing Element would not result in air quality impacts, create objectionable odors, or expose sensitive receptors to substantial pollutant concentrations. Therefore, there would be no impact.

### **Addendum Analysis**

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to air quality. Potential air quality-related impacts cannot be assessed in a meaningful way until a project specific analysis is done covering the size of the development which includes construction air quality emissions, project operational emissions and potential vehicle miles traveled. The Housing Element Update buildout includes the total RHNA of 1,910 units with a total capacity of 3,257 units, which is within the increase analyzed in the General Plan EIR. Short-term air quality impacts resulting from construction of the sites, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers would be subject to the Bay Area Air Quality Management District (BAAQMD) rules and protocols. Similarly, operational impacts would be addressed by provisions in the General Plan, the Petaluma Municipal Code, and other regulations and standards that govern air quality in Petaluma.

All future development consistent with the Housing Element Update would be required to comply with all relevant regulations related to air quality at the time of construction including policies from the Petaluma General Plan and the BAAQMD Clean Air Plan.

## **Conclusion**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the 5th Cycle Housing Element IS-ND. Therefore, the 5th Cycle Housing Element IS-ND and General Plan EIR apply to the Housing Element Update and no additional environmental assessment of air quality is required.

## **6.4 Biological Resources**

### **5th Cycle Housing Element IS-ND Biological Resources Findings**

The 5th Cycle Housing Element IS-ND determined that there would be no impact to biological resources. Impacts to threatened, endangered, candidate, sensitive, and special status species either directly or through habitat modifications resulting from the anticipated growth and development of the city were previously addressed in the General Plan EIR. The IS-ND determined that future development may be subject to additional review and compliance with applicable policies. Adopting the Housing Element update would not by itself have a substantial effect on any riparian habitat or other sensitive natural community. The City of Petaluma does contain wetlands listed in the National Wetland Inventory. However, impacts to these wetlands were previously identified in the General Plan EIR. Compliance with applicable General Plan policies and the Implementing Zoning Ordinance would ensure that there would be no impact to wetlands due to the adoption of the 5th Cycle Housing Element. The 5th Cycle Housing Element IS-ND states that the General Plan EIR concluded that development within the city's urban growth boundary would not interfere with the movement of fish or other wildlife species that migrate through the already urbanized areas of the city. The 5th Cycle Housing Element IS-ND also determined that adoption of the Housing Element would not conflict with any local policies or ordinances protecting biological resources. All specific projects proposed under the Housing Element would be required to conform to zoning, design standards, and other local, regional, or state regulations and policies included in the Petaluma General Plan concerning the protection of biological resources, including listed species, habitats, and all planning resources designed to protect and conserve these resources.

### **Addendum Analysis**

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document that is consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. Furthermore, protection of special status species and habitat is mandated by federal and State laws. There are no adopted Habitat Conservation Plans applicable to the city. Future development would be required to comply with

General Plan policies and Petaluma Municipal Code requirements related to species and habitat protection and tree preservation.

The Housing Element Update, in and of itself, does not include specific projects involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to biological resources. All future development consistent with the Housing Element Update would be required to comply with applicable regulations regarding biological resources and policies and actions from the Petaluma General Plan as well as State and Federal regulations.

## **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of biological resources is required.

## **6.5 Cultural Resources**

### **5th Cycle Housing Element IS-ND Cultural Resources Findings**

The 5th Cycle Housing Element IS-ND determined that the Petaluma General Plan includes policies and actions that would reduce impacts to cultural, historical, paleontological, and archaeological resources, as well as human remains, to less than significant level and that these policies would be applicable to the housing element. Impacts on cultural resources resulting from anticipated growth and development or from the removal, modification or demolition of existing residences were addressed in the General Plan EIR. Mitigation measures integrated into the various elements of the General Plan in the form of goals, policies, and implementation measures would reduce impacts to a level of less than significant. Depending on the attributes of each individual development proposal, future development would be subject to additional environmental review, development standards and compliance with all applicable policies related to any cultural resources. Therefore, there would be no impact to cultural resources.

### **Addendum Analysis**

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. Although known historic and prehistoric resource sites are located throughout Petaluma, and there are over 300 properties of potential historical significance recorded throughout the city, future development would be evaluated for conformance with the City's General Plan, Municipal Code, and other applicable State and local regulations. In addition, projects proposed under the Housing Element Update would undergo review by the Historic and Cultural Preservation Committee to ensure that any development within a historical district would be compliant with all applicable cultural resource regulations.

The Housing Element Update, in and of itself, does not include specific projects involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to cultural resources. All future development consistent with the Housing Element Update would be required to comply with applicable policies and regulations regarding cultural resources including policies and actions from the Petaluma General Plan.

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the Housing Element IS-ND and the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of cultural resources is required.

## 6.6 Energy

### 5th Cycle Housing Element IS-ND Energy Findings

The 5th Cycle Housing Element IS-ND discusses energy in sections like Section 3, *Air Quality*, and Section 8, *Greenhouse Gases and Climate Change*. At the time the 5th Cycle Housing Element IS-ND was prepared, energy impacts were not included in the Appendix G checklist under CEQA.

It was determined that the 5th Cycle Housing Element Update would not conflict with the energy efficiency control measures presented in the 2010 Clean Air Plan. The City's General Plan is considered to be consistent with the Clean Air Plan (CAP) since it supports the primary goals, includes control measures, and does not conflict with or disrupt implementation of control measures. Similarly, the 5th Cycle Housing Element was determined to be consistent with the CAP as there would be no conflict with CAP implementation due to updated in proposed policies and programs set forth therein. Because it is a policy document, the IS-ND concluded that the Housing Element in and of itself would not result in wasteful, inefficient, or unnecessary energy use. Therefore, impacts were determined to be less than significant.

## Addendum Analysis

Similar to the 5th Cycle Housing Element, the 6th Cycle Housing Element Update is a policy document consistent with the General Plan and the current CAP. The 6th Cycle Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. New housing projects would be required to adhere to the current California Energy Code and CALGreen standards, which include requirements for the use of more energy-efficient design and technologies. New development would use electricity supplied by PG&E or Sonoma Clean Power (SCP). PG&E sourced 50 percent of their electricity in 2021 from renewable resources that qualify under California's Renewable Portfolio Standard (RPS) (PG&E 2022). SCP generates power for customers located in Sonoma and Mendocino Counties. SCP's CleanStart service is 49 percent renewable and 93 percent carbon-free, from sources considered renewable under California's regulations, like wind, solar, biomass, and geothermal, and 44 percent from large hydropower facilities (SCP 2023). The remaining power comes from "system power," which is largely natural gas, but may include some renewables.

SCP's EverGreen is 100 percent renewable power generated from geothermal and solar sources in SPC's service area (SCP 2023).

The 6th Cycle Housing Element Update, in and of itself, does not include a specific project involving a new housing development but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the 6th Cycle Housing Element Update would not, in and of itself, result in impacts to energy resources or adopted plans for renewable or efficient energy use. Although future projects would involve the consumption of non-renewable energy resources such as electricity, natural gas, propane, gasoline, and diesel, they would be required to comply with State and local regulations pertaining to energy, such as Title 20, Energy Building Regulation, and Title 24, Energy Conservation Standards, of the California Code of Regulations (CCR) and the City's All-Electric Code. Future development would also be required to comply with policies and actions from the Petaluma General Plan and the City's municipal code.

In addition, the 6th Cycle Housing Element Update include goals and policies aimed at encouraging energy conservation to reduce greenhouse gas emissions. Those policies are as follows:

**Goal 10: Encourage energy conservation in housing and reduce the contribution to greenhouse gases from existing sources and minimize the contribution of greenhouse gases from new construction and sources.**

**Policy 10.1:** Continue to evaluate residential projects for consistency with Section 66473.1 (Energy Conservation) of the Subdivision Map Act during the development review process.

**Policy 10.2:** Continue to require the planting of street and parking lot trees as part of residential projects to provide cooling during the summer months.

## **Conclusion**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5<sup>th</sup> Cycle Housing Element IS-ND applies to the 6<sup>th</sup> Cycle Housing Element Update and no additional environmental assessment of energy is required.

## 6.7 Geology and Soils

### 5th Cycle Housing Element IS-ND Geology and Soils Findings

The General Plan EIR determined that there would be no impacts to geology and soils for adverse effects related to rupture of a known fault, strong ground shaking, seismic-related ground failure, or landslides; soil erosion; landslide, lateral spreading, subsidence, liquefaction, or collapse; locating development on expansive soils; and installing septic tanks and alternative wastewater disposal systems in capable soils. Adoption of the housing element in and of itself would not expose people or property to adverse effects resulting from seismic activity, soil erosion, liquefaction or expansive soils. Standard measures integrated into the General Plan in the form of goals, policies, and implementation measures applicable to future development projects would reduce the severity of potential impacts. Conformance with standard Uniform Building Code Guidelines, General Plan policies, and Implementing Zoning Code would also minimize potential impacts. Depending on the attributes of each development proposal under the housing element, future development would be subject to further environmental review as it relates to impacts to geology and soils. The 5th Cycle Housing Element IS-ND determined there would be no impact to geology and soils.

The 5<sup>th</sup> Cycle Housing Element IS-ND addressed paleontological resources in Section 5, *Cultural Resources*, and determined that there would be no impact to paleontological resources.

### Addendum Analysis

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include specific projects involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to geology and soils. All future development consistent with the Housing Element Update would be required to comply with relevant policies and regulations regarding geology and soils including policies and actions from the Petaluma General Plan.

### Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND is applicable to the 6<sup>th</sup> Cycle Housing Element Update and no additional environmental assessment of geology and soils is required.

## 6.8 Greenhouse Gas Emissions

### 5th Cycle Housing Element IS-ND Greenhouse Gas Emissions Findings

The 5th Cycle Housing Element IS-ND refers to the General Plan EIR in its discussion of greenhouse gas impacts. The General Plan EIR determined that development allowed under the General Plan, including development encouraged by the Housing Element Update, could result in a cumulatively considerable incremental contribution from General Plan development to the significant impact of global climate change. This impact was found to be significant and unavoidable. The Housing Element Update would not conflict with any plans, policies, or regulations intended to reduce greenhouse gas emissions. Depending on the attributes of each individual development proposal, future development would be subject to additional environmental review and compliance with all applicable strategies and implementation actions adopted for the purpose of reducing greenhouse gas emissions. Therefore, impacts were determined to be less than significant.

### Addendum Analysis

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

Potential greenhouse gas emission impacts cannot be assessed in a meaningful way until a project-specific analysis that takes into account factors including the size of the development, construction greenhouse gas emissions, project operational emissions, and potential vehicle miles traveled is conducted. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to greenhouse gas emissions or adopted plans for the purpose of reducing greenhouse gases. Future development consistent with the Housing Element Update would be required to adhere to applicable climate and greenhouse gas emissions policies and regulations including consistency with SB 32, AB 32, SB 97, and SB 375. Future development would also be required to comply with policies in the Petaluma General Plan.

### Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of greenhouse gas emissions is required.

## 6.9 Hazards and Hazardous Materials

### 5th Cycle Housing Element IS-ND Hazards and Hazardous Materials Findings

The 5th Cycle Housing Element IS-ND determined that there would be no impact regarding the potential to create a significant hazard to the public through the routine transport, use, or disposal of hazardous materials; emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or location of projects on sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The IS-ND found that the city is not located within an airport land use plan or within the vicinity of a private airstrip, and implementation of the Housing Element does not have the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Additionally, any project proposed in the City would have to conform to any applicable adopted local or State codes that regulate public health and safety, such as the Uniform Building, Plumbing, Electrical, or Mechanical Codes.

The Housing Element IS-ND found that there would be no impact regarding the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires. Anticipated growth and development in Petaluma was addressed in the General Plan EIR and mitigation measures included as policies in the General Plan would be applicable to the Housing Element Update; therefore, there would be no impact beyond what was previously identified in the General Plan EIR.

### Addendum Analysis

The General Plan goals and policies support reduction of hazards and hazardous materials impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the proposed Housing Element Update.

Similar to the 5th Cycle Housing Element, the 6<sup>th</sup> Cycle Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. The Housing Element Update includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. The City requires new projects to analyze potential site-specific hazardous waste impacts pursuant to State regulations.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to hazards or hazardous materials. All future development consistent with the Housing Element Update would be required to comply with applicable policies and guidelines regarding hazards and hazardous materials including policies and actions from the Petaluma General Plan.

### Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the Housing Element IS-ND applies to the

Housing Element Update and no additional environmental assessment of hazards and hazardous materials is required.

## 6.10 Hydrology and Water Quality

### **5th Cycle Housing Element IS-ND Hydrology and Water Quality Findings**

Based on the findings of the General Plan EIR, the 5th Cycle Housing Element IS-ND determined the City has adequate groundwater water supply and recharge to accommodate the buildout that was projected in the Petaluma General Plan. The General Plan includes policies to reduce the impacts related to erosion and siltation, drainage patterns, and flooding. Specifically, the General Plan created the Petaluma River Corridor and setback provisions to mitigate impacts resulting from the 100-year flood zone. The 5th Cycle IS-ND found that, as a policy document, the project would not affect groundwater. As a policy and regulatory document, implementation of the 2015- 2023 Housing Element update would not result in the depleting, degrading or altering of ground water supplies. The City has adequate water supply resources to accommodate development of the City in compliance with the buildout projection established in the General Plan. In addition, the 5th Cycle Housing Element IS-ND determined that adoption and implementation of the Housing Element would not result in substantial alteration of drainage patterns, increase the rate of runoff, create or contribute runoff water that would exceed existing or future facility capacities, or contribute to increased amounts of polluted runoff water. Depending on the attributes of each development project, future development may be subject to further environmental review as it relates to stormwater runoff, drainage patterns, and erosion. The IS-ND found there were no impacts related to flooding that were not already addressed in the General Plan EIR. Therefore, there would be no impact to hydrology and water quality.

### **Addendum Analysis**

The General Plan EIR discusses goals and policies that support reduction of hydrology and water quality impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. Specifically, Policy 8-P-20 to manage groundwater as a valuable resource, and Policies 4-P-1 and 8-P-29 that require setbacks from all creeks and tributaries to the Petaluma River. These policies and actions would be required with implementation of the Housing Element Update.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to hydrology or water quality. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to hydrology and water quality including policies and actions from the Petaluma General Plan.

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the IS-ND. Therefore, the Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of hydrology and water quality is required.

## 6.11 Land Use and Planning

### 5th Cycle Housing Element IS-ND Land Use Planning Findings

The 5th Cycle Housing Element IS-ND determined that there would be no impacts to land use and planning as they pertain to conflicts with applicable land use plans, population growth, and potential to displace people or existing housing. It found that the Housing Element would be consistent with all relevant documents that regulate land use. In addition, impacts from anticipated growth were addressed in the General Plan EIR. No new or increased impacts as a result of the Housing Element would result in growth above what was anticipated in existing environmental documents, and the Housing Element would not divide an established community. The 5<sup>th</sup> Cycle IS-ND concluded that there would be no impacts to Land Use and Planning.

### Addendum Analysis

The proposed Housing Element goals and policies support reduction of impacts due to land use and planning. However, no formal land use changes or physical development are proposed at the time of adoption of the Housing Element.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts due to land use or planning. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to land use and planning.

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of land use and planning is required.

## 6.12 Mineral Resources

### **5th Cycle Housing Element IS-ND Mineral Resources Findings**

The 5th Cycle Housing Element IS-ND determined that, as a policy document, the Housing Element itself would not result in the loss of availability of a known mineral resource or of a locally important mineral resource recovery site. The 5th Cycle Housing Element IS-ND relied on analysis in the General Plan EIR that no mineral resources would be affected through the implementation of the General Plan. Development facilitated by the Housing Element would be subject to additional environmental review and compliance with all applicable policies related to mineral resources. Therefore, there would be no impact.

### **Addendum Analysis**

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts due to mineral resources. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to mineral resources.

### **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of mineral resources is required.

## 6.13 Noise

### **5th Cycle Housing Element IS-ND Noise Findings**

The City's 5th Cycle Housing Element IS-ND determined that the Housing Element would not, in and of itself, result in exposure of persons to or generation of noise levels in excess of standards established in the City of Petaluma's Noise Ordinance, or applicable standards of other agencies. Impacts related to groundborne noise levels and vibration were determined to have no impact. Adoption of the Housing Element would not result in permanent increase in ambient noise levels in the city above existing levels. Adoption of the Housing Element by itself would not result in a substantial temporary or periodic increase in ambient noise levels in the city above existing levels. The Petaluma Municipal Airport is

classified in the National Plan of Integrated Airport Systems as a reliever airport for the greater San Francisco Bay Area. Most of the land north and east of the airport is agricultural or dedicated parks and open space land. Residential development lies close to the airport on its southwest and northwest side. All new residential developments within the 55 to 65 CNEL contour would be subject to an outdoor-to-indoor noise level reduction of at least 25-30 decibels. There are no private airstrips located in the city. All future development would be subject to site-specific environmental studies as determined appropriate by the City and would comply with all City policies and regulations related to noise. While the General Plan EIR does state that noise induced by increased traffic due to the General Plan buildout and cumulative rail operations would be considered significant and unavoidable impacts, buildout of the 5th Cycle Housing Element was found to be within the growth considered in the General Plan EIR. Thus, the 5th Cycle Housing Element IS-ND determined that there would be no impacts associated with noise and vibration. Mitigation measures were integrated into the General Plan as goals, policies, and programs.

## **Addendum Analysis**

The General Plan goals and policies support reduction of noise-related impacts. Policies and actions in the General Plan are implemented to help reduce noise-related impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. Potential noise impacts for projects requiring discretionary approval cannot be assessed in a meaningful way until a project specific analysis, if required, is done covering the size of the development which includes construction noise, project operational noise and traffic-related noise.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in noise-related impacts. All future development consistent with the Housing Element Update would be required to comply with all relevant policies and guidelines regarding noise including the policies and actions from the Petaluma General Plan.

## **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of noise is required.

## 6.14 Population and Housing

### **5th Cycle Housing Element IS-ND Population and Housing Findings**

The 5th Cycle Housing Element IS-ND determined that the Housing Element, in and of itself, would not induce substantial population growth in the city. The 5th Cycle Housing Element IS-ND cited ABAG's population projections show a projected population high of 67,200 in 2040. This is 8,200 residents more than the City's population of 59,000 people at the time the General Plan was prepared. This is below the projected buildout under the 2008 General Plan, which is 72,707 by 2025. Therefore, population growth estimated for the Housing Element would be consistent with that of the 2008 General Plan, and impacts would be less than significant. The 5th Cycle Housing Element IS-ND determined that the Housing Element would not result in the displacement of substantial numbers of existing housing units and would not result in the displacement of substantial numbers of people. Therefore, there would be no impact.

### **Addendum Analysis**

The 3,257 units that would be accommodated by the proposed Housing Element Update consist of 144 ADUs, 1,760 units from pipeline projects, and 1,353 units located on opportunity sites. Assuming an average of 2.50 persons per household (DOF 2022), the Housing Element Update would result in a population growth of approximately 8,143 residents, which is within the General Plan buildout analyzed in the General Plan EIR and cited in 5th Cycle Housing Element IS-ND. The Housing Element Update would be consistent with State requirements for the RHNA to plan adequately to meet existing and projected housing needs for all economic segments of the community.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. All future development would be required to comply with applicable guidelines and regulations including policies and actions outlined in the City's General Plan.

### **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of population and housing is required.

## 6.15 Public Services

### 5th Cycle Housing Element IS-ND Public Services Findings

The 5th Cycle Housing Element IS-ND determined that the housing element, in and of itself, would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection, police protection, school, park, and public facilities. Impacts associated with public service facilities resulting from the anticipated growth and development in the city were addressed in the General Plan EIR. Mitigation measures were integrated into the General Plan in the form of goals, policies, and implementation measures to reduce significant impacts to less than significant levels. Depending on the attributes of each development proposal, future development would be subject to additional environmental review and compliance with all applicable policies related to public services. The IS-ND concluded that the 5<sup>th</sup> Cycle Housing Element would result in no impacts to public services.

### Addendum Analysis

The General Plan goals and policies support reduction of impacts to public services. Policies and actions in the General Plan are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. The 3,257 units that would be accommodated by the Housing Element Update consist of 144 ADUs, 1,760 units from pipeline projects, and 1,353 units located on opportunity sites. The 6<sup>th</sup> Cycle Housing Element Update would result in a population growth of approximately 8,143 residents, which is within the General Plan buildout analyzed in the General Plan EIR and cited in 5th Cycle Housing Element IS-ND (DOF 2022). Therefore, no new or expanded public services would be required beyond those included in the buildout of the General Plan. Since the sites are already served by fire, police, and emergency services, housing that may be built on these sites would not create a substantial change from current conditions.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to public services. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to public services including the policies and actions from the Petaluma General Plan.

### Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of public services and recreation is required.

## 6.16 Recreation

### **5th Cycle Housing Element IS-ND Recreation Findings**

The 5th Cycle Housing Element IS-ND determined that there would be no impact to existing park and recreational facilities. In addition, it was determined that the 5<sup>th</sup> Cycle Housing Element would not include provisions for new and/or expanded recreational facilities, and no mitigation would be required. Impacts associated with construction or expansion of recreational facilities in response to population growth has been addressed in the General Plan EIR. Mitigation measures were integrated in the 2008 General Plan in the form of goals, policies, and implementation measures reduce all significant impacts to less than significant levels. The 5th Cycle Housing Element IS-ND also stated that as future parks and recreation projects are considered by the City, each project would be evaluated for conformance with the General Plan, Municipal Code, and other applicable regulations. Depending on the attributes of each individual development proposal, future development would be subject to additional environmental review and compliance with all applicable policies related to recreational facilities. Therefore, the 5<sup>th</sup> Cycle Housing Element IS-ND concluded that there would be no impacts to recreational facilities.

### **Addendum Analysis**

The proposed Housing Element Update would result in a population growth of approximately 8,143 residents, which is within the General Plan buildout analyzed in the General Plan EIR and cited in 5th Cycle Housing Element IS-ND. The General Plan goals and policies support reduction of impacts to parks and recreation facilities. Policies and actions in the General Plan are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the proposed Housing Element Update.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to recreation facilities. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to recreation including the policies and actions from the Petaluma General Plan.

### **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of recreation is required.

## 6.17 Transportation

### 5th Cycle Housing Element IS-ND Transportation Findings

The 5th Cycle Housing Element IS-ND determined that adoption of the Housing Element, in and of itself, would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. Increases in traffic resulting from anticipated growth and development of the City had been previously analyzed in the General Plan EIR. The traffic impacts of any new development would be addressed in separate site-specific studies. Mitigation measures have been integrated into the General Plan in the form of goals, policies, and implementation measures to reduce impacts. The IS-ND determined that the Housing Element would not introduce any new or more severe impacts relative to what was previously analyzed in the General Plan EIR. The General Plan EIR utilized level of service (LOS) in its quantified analysis of the General Plan, and had determined that impacts would be considered significant and unavoidable. However, under SB 743, LOS can no longer be considered a significant impact on the environment under CEQA. The 5th Cycle Housing Element IS-ND also determined that adoption of the Housing Element would not cause traffic levels to exceed, either individually or cumulatively, a level of service standards established by the County congestion management agency or designated roads or highways.

In addition, it was determined that the Housing Element would not have an impact on air traffic patterns. Adoption of the Housing Element would not involve construction or physical design, which would result in impacts associated with hazards to transportation-related design features or incompatible uses, or result in the construction of residential units that could result in inadequate emergency access. No recommendations contained in the Housing Element conflicted with adopted plans, policies, or programs supporting alternative modes of transportation. Therefore, the IS-ND concluded that the 5th Cycle Housing Element would result in no impact to transportation.

### Addendum Analysis

The General Plan goals and policies support reduction of impacts to transportation and traffic. Policies and actions in the General Plan are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

Since the certification of the General Plan EIR and adoption of the 5th Cycle Housing Element IS-ND, SB 743 has been adopted. SB 743 updates the way transportation impacts are measured in California for new development projects. Previously, transportation impacts were evaluated by examining whether the project is likely to cause automobile delay at intersections and congestion on nearby individual highway segments, and whether this delay will exceed a certain amount. This is known as LOS. Beginning on July 1, 2020, agencies must now analyze vehicle miles travelled (VMT) and may not use LOS as the determinant for a significant impact under CEQA.

In July of 2021, the City of Petaluma developed and published its own VMT Implementation Guidelines. Individual development projects facilitated by the proposed Housing Element Update would undergo individual environmental review in order to determine compliance with the City and state VMT thresholds.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. includes ADUs. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites

already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to transportation and traffic. By supporting urban infill, the Housing Element Update would encourage development in areas near transit, services, and jobs, which would reduce future residents' reliance on single-occupancy vehicles and thereby reducing VMT. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to transportation including the policies and actions from the Petaluma General Plan.

## **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of transportation and traffic is required.

## **6.18 Tribal Cultural Resources**

### **5th Cycle Housing Element IS-ND Tribal Cultural Resource Findings**

The 5th Cycle Housing Element IS-ND does not include a chapter or section dedicated to analysis of impacts to tribal cultural resources. However, it does analyze general impacts to historical and cultural resources (including archeological resources that may originate from Native American tribes) in Section 5, *Cultural Resources*, and concludes that there would be no impacts to historic and cultural resources.

As discussed in Section 5, *Cultural Resources*, of the 5th Cycle Housing Element IS-ND, the Petaluma General Plan includes policies and actions aimed at reducing potential impacts to tribal cultural resources.

### **Addendum Analysis**

As part of the outreach efforts associated with the Housing Element Update, letters were sent to the following tribes and tribal contacts, in compliance with Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18), to request information regarding the Housing Element Update on December 7, 2022:

- Buffy McQuillen, Tribal Heritage Preservation Officer, Federated Indians of Graton Rancheria

The Federated Indians of Graton Rancheria responded with a letter dated January 3, 2022 requesting formal consultation under PCR Section 21080.3.1 and SB 18. On January 25, 2023, the City of Petaluma met with representatives from the Federated Indians of Graton Rancheria to discuss state regulation, policies, and local approaches towards the protection of tribal cultural resources within the Planning Area. No specific resources or previously unknown tribal cultural resources within the Planning Area

were identified during the consultation meeting. The City sent the draft Housing Element addendum to the Federated Indians of Graton Rancheria on February 13, 2023.

The General Plan goals and policies support reduction of impacts to tribal cultural resources. Policies and actions in the General Plan are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the proposed Housing Element Update.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to tribal cultural resources. Additionally, the City will continue to comply with AB 52, SB 18, and AB 168 as applicable.

All future development consistent with the Housing Element Update must comply with General Plan policies and programs that would minimize impacts to tribal cultural resources and must comply with all applicable regulations regarding tribal cultural resources and the policies and actions from the Petaluma General Plan and state regulation.

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the 5th Cycle Housing Element IS-ND. Therefore, the 5th Cycle Housing Element IS-ND applies to the proposed Housing Element Update and no additional environmental assessment of tribal cultural resources is required.

## 6.19 Utilities and Service Systems

### 5th Cycle Housing Element IS-ND Utilities and Service Systems Findings

The 5th Cycle Housing Element IS-ND determined that there would be no impact to utilities and service systems. The Housing Element would not cause or exceed wastewater treatment requirements. Impacts of full residential buildout on wastewater treatment was addressed in the General Plan EIR. Mitigation measures have been integrated into the General Plan in the form of goals, policies, and implementation measures to reduce all potentially significant impacts to less than significant levels. The 5th Cycle Housing Element IS-ND determined that the Housing Element would not increase demand for services beyond what was evaluated in the General Plan EIR. In addition, the 5th Cycle Housing Element IS-ND states that adoption of the Housing Element would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.

The 5th Cycle Housing Element IS-ND determined that with the incorporation of Low Impact Development (LID) requirements, upsizing of storm drain mains may not be required. However, LID also requires water quality treatment of runoff coming from impervious surfaces. Developments facilitated by the Housing Element would include improvements that treat and potentially detain runoff from development sites. Further analysis of individual developments would be required in order to determine the site's storm water detention needs. It was determined that adoption of the Housing Element would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities. There would be no impact.

In addition, the 5th Cycle Housing Element IS-ND determined that there would be no impact to water supply, wastewater treatment facility capacity, solid waste facility capacity, or solid waste regulations. Impacts related to water, wastewater, and solid waste disposal needs resulting from anticipated growth of the city were addressed in the General Plan EIR. Mitigation measures have been integrated into the General Plan in the form of goals, policies, and implementation measures to reduce all significant impacts to a less than significant level. The IS-ND concluded that the Housing Element would not increase demand for services beyond what had been previously identified in the General Plan EIR.

### **Addendum Analysis**

The General Plan goals and policies support reduction of impacts to utilities and service systems. Policies and actions in the General Plan are implemented to help reduce impacts to utilities and service system to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. Pipeline projects that are approved or pending have already undergone environmental analysis, if required. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure for utilities already exists throughout the City. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to utilities and service systems. All future development consistent with the Housing Element Update would be subject to adopted development guidelines and other regulatory requirements concerning water, wastewater, storm drains, solid waste, and other infrastructure; water supply; and wastewater treatment systems including the policies and actions from the Petaluma General Plan.

### **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of utilities and service systems is required.

## 6.20 Wildfire

### 5th Cycle Housing Element IS-ND Wildfire Findings

The 5th Cycle Housing Element IS-ND discusses wildfire in Section 8, *Hazards/Hazardous Materials*. At the time the 5th Cycle Housing Element IS-ND was prepared, there were no adopted Appendix G questions for wildfire impacts under CEQA.

The 5th Cycle Housing Element IS-ND determined that impacts resulting from anticipated growth and development of the city increasing wildfire risk were addressed in the General Plan EIR. Standard measures integrated into the General Plan in the form of goals, policies, and implementation measures applicable to future development projects would reduce the severity of impacts. Implementation of the Housing Element would have no impact beyond what was previously identified in the General Plan EIR.

### Addendum Analysis

The City of Petaluma is not categorized as a “Very High” Fire Hazard Severity Zone (FHSZ) by CalFire. The closest “Very High” FHSZ is located east of SR 12 in Glen Ellen, approximately 11 miles northeast of city limits. State Responsibility Areas within the vicinity of Petaluma are primarily found to the east and west of the city limits. Approximately 1.3 miles to the west of the city limits is a “Moderate” FHSZ that begins in Helen Putnam Regional Park. This area is generally rolling to steep slopes with increased vegetation. There are no Federal Responsibility Areas within the vicinity of City of Petaluma.

The General Plan goals and policies support reduction of impacts to wildfire. Policies and actions in the General Plan are implemented to help reduce impacts to the greatest extent possible. These policies and actions would remain in practice with implementation of the Housing Element Update.

Similar to the 5th Cycle Housing Element, the Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes ADUs, pipeline projects, and housing opportunity sites consisting of vacant and underutilized properties as well as shopping center parking lots that could accommodate new or additional housing units. The Housing Opportunity Sites included in the Housing Element Update remain approximately 11 miles from a “Very High” FHSZ and impacts regarding wildfire would not change significantly from current conditions. Permitted building construction in the City’s Wildland Urban Interface (WUI) or State Responsibility Areas (SRA) on the southern edge of the city requires all structures to be built according to specific codes. This includes Chapter 7A, in the California Building Code and Chapter 337 in the California Residential Code which require all new structures to be built with exterior construction that will minimize the impact on life and property and help structure to resist the intrusion of flames and burning embers projected by a wildland fire and contributes to a reduction of losses. In addition, all new development must comply with the standards developed in the California Fire Code, Title 24, Part 9. Compliance with the California Building Code, California Fire Code, and California Residential Code would help reduce potential wildfire impacts to new development along the City’s WUI.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Petaluma, consistent with the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to wildfire. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to wildfire.

## **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the Housing Element Update and no additional environmental assessment of wildfire is required.

## 7 Summary of Findings

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The Housing Element Update is part of the City's General Plan, and like other elements within the General Plan, it includes goals and policies that the City should meet when it comes to the planning of housing. The Housing Element is also unique from the other elements within the General Plan because it is required to be periodically updated to align with the State's allocation of the RHNA. Also, the Housing Element includes Housing Programs that are required to be implemented within the planning period established for the Housing Element. These programs are usually implemented over time after the Element is adopted.

The Housing Element Update does not involve site-specific projects nor changes in the currently adopted General Plan land uses, therefore the adoption of the Housing Element would be consistent with the 5th Cycle Housing Element IS-ND adopted in December 2014. The General Plan EIR analyzed full buildout of the City's General Plan as adopted in 2008. The 5th Cycle Housing Element IS-ND analyzed implementation of the Housing Element as a policy document, tiering off the General Plan EIR and utilizing the anticipated impacts defined within the General Plan EIR. Future development facilitated by the Housing Element would be subject to applicable development standards and reviews established by City ordinances. Additionally, future development requiring discretionary review may be subject to CEQA compliance if it is not consistent with the General Plan or Housing Element.

It has been determined through this analysis that the adoption of the proposed Housing Element Update would not result in impacts beyond those addressed or analyzed in the 5th Cycle Housing Element IS-ND, nor does the Housing Element Update present new information that shows impacts would be more significant than those described in the 5th Cycle Housing Element IS-ND and the General Plan EIR. Therefore, the 5th Cycle Housing Element IS-ND applies to the proposed Housing Element Update and no additional environmental compliance is required.

The analysis pursuant to Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR or adopted ND, that an addendum to the existing EIR or ND would be appropriate, and no new environmental document, such as a new EIR or ND, would be required. The addendum need not be circulated for public review but can be included in or attached to the final ND, and the decision-making body shall consider the addendum with the final ND prior to deciding on the project.

## 8 References

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### 8.2 List of Preparers

Rincon Consultants, Inc. prepared this EIR Addendum under contract to the City of Petaluma. Persons involved in data gathering analysis, project management, and quality control are listed below.

#### **RINCON CONSULTANTS, INC.**

Matt Maddox, AICP, Principal  
Katherine Green, Senior Planner/Project Manager  
Antonia Davetas, Environmental Planner  
Hannah Bireschi, Environmental Planner

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