
IV. SUMMARY OF THE INITIAL STUDY

A. INTRODUCTION

Section 15128 of the *CEQA Guidelines* states:

"An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an Initial Study."

Per Section 15050(d) of the *CEQA Guidelines*, the County of Sonoma has identified that an EIR is required to be prepared for the proposed project. An Initial Study was prepared to facilitate the appropriate due diligence and full disclosure of potentially significant impacts that may be associated with the project. The Initial Study was prepared for the proposed project in February 2006 and was distributed with the Notice of Preparation (NOP) to prepare a Draft EIR (both available in Appendix A). The purpose of this section is to summarize the Initial Study and the issues that will be analyzed in this EIR.

B. NO PROJECT IMPACTS

No project impacts identified in the Initial Study related to the following (see discussion in Appendix A):

- Agricultural Resources (2.a to 2.c) - The Initial Study determined that the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), would not conflict with existing zoning for agricultural use, or a Williamson Act contract, and would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.
- Biological Resources (4.f) - The Initial Study determined that the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat conservation plan.
- Geology and Soils, 6.a(I) - The Initial Study determined that the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known.
- Geology and Soils, 6.a(iv) - The Initial Study determined that the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.
- Hazards and Hazardous Materials, 7.c - The Initial Study determined that the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

- Hazards and Hazardous Materials, 7.d - The Initial Study determined that the project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- Hazards and Hazardous Materials, 7.e - The Initial Study determined that the project would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.
- Hazards and Hazardous Materials, 7.f - The Initial Study determined that the project site is not located within the vicinity of a private airstrip, and therefore the project would not result in a safety hazard (related to a private airstrip) for people residing or working in the project area.
- Hazards and Hazardous Materials, 7.g - The Initial Study determined that the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Hydrology and Water Quality, 8.g - The Initial Study determined that the project would not place housing within a 100-year hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.
- Land Use and Planning, 9.a - The Initial Study determined that the project would not physically divide an established community.
- Land Use and Planning, 9.c - The Initial Study determined that the project would not conflict with any applicable habitat conservation plan or natural community conservation plan.
- Mineral Resources, 10.a - The Initial Study determined that the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- Mineral Resources, 10.b - The Initial Study determined that the project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.
- Noise, 11.e - The Initial Study determined that the project is not located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.
- Noise, 11.f - The Initial Study determined that the project is not located within the vicinity of a private airstrip, the project would expose people residing or working in the project area to excessive noise levels.
- Population and Housing, 12.a - The Initial Study determined that the project would not induce substantial population growth in an area, either directly or indirectly.

- Population and Housing, 12.b - The Initial Study determined that the project would not displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere.
- Population and Housing, 12.c - The Initial Study determined that the project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.
- Public Services, 13.a(I, iv) - The Initial Study determined that the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives for schools and parks.
- Recreation, 14.a - The Initial Study determined that the project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Recreation, 14.b - The Initial Study determined that the project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.
- Transportation/Traffic, 15.c - The Initial Study determined that the project would not result in inadequate emergency access.
- Transportation/Traffic, 15.e - The Initial Study determined that the project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- Transportation/Traffic, 15.f - The Initial Study determined that the project would not result in inadequate parking capacity.
- Transportation/Traffic, 15.g - The Initial Study determined that the project would not conflict with adopted policies, plans, or programs supporting alternative transportation.
- Utilities and Service Systems, 16.b - The Initial Study determined that the project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Utilities and Service Systems, 16.e - The project would use an on-site AdvanTex recirculating septic system, with an on-site leachfield for wastewater treatment. Preliminary analysis showed adequate septic capacity of the property. Therefore, the Initial Study determined that the project would not require a capacity adequacy determination by an outside wastewater treatment provider.
- Utilities and Service Systems, 16.f - The Initial Study determined that the project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.
- Utilities and Service Systems, 16.g - The Initial Study determined that the project would comply with federal, state, and local statutes and regulations related to solid waste.

C. LESS-THAN-SIGNIFICANT IMPACTS

Less-than-significant impacts identified in the Initial Study related to the following (see discussion in Appendix A):

- Aesthetics, 1.b - The Initial Study determined that the project would not have a substantial impact to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway because the project is not located near a state scenic highway.
- Cultural Resources, 5.a - The Initial Study determined that the project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 because the structures associated with the existing Historic District Overlay Zone designation no longer exist and no other historic resources have been identified on the site.
- Geology and Soils, 6.b - The Initial Study determined that the project would not cause a result in substantial soil erosion or the loss of topsoil because the relatively flat topography of the site and proposed storm water drainage systems would limit erosion and because commercial uses typically have greater lot coverage than non-commercial uses.
- Geology and Soils, 6.d - The Initial Study determined that the project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property because the expansion characteristics of the soils on the site are considered low.
- Geology and Soils, 6.e - The Initial Study determined that the project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, creating substantial risks to life or property because the County's Project Review Health Specialist has reviewed the project and has required that a Registered Civil Engineer or Registered Environmental Health Specialist design a septic system that can accommodate the wastewater generated by the project.
- Hazards and Hazardous Materials, 7.h - The Initial Study determined that the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. This includes where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands because, although the property is adjacent to grasslands and open space, the threat posed by wildland fires is minimal.
- Hydrology and Water Quality, 8.a - The Initial Study determined that the project would not violate any water quality standards or waste discharge requirements because the County's Project Review Health Specialist has reviewed the project and required that a Registered Civil Engineer or Registered Environmental Health Specialist design the proposed septic system to accommodate the wastewater generated by the project. Development of the project also requires an application for waste discharge permits from the Bay Area Regional Water Quality Control Board and a National Pollution Discharge Elimination System permit. The Board will assess all aspects of wastewater discharge to insure that there is no failure to the subsurface. This will insure that there would not be a violation of any water quality standards or waste discharge requirements.

- Hydrology and Water Quality, 8.b - The Initial Study determined that the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The project does not propose to use groundwater. Non-potable water would be supplied primarily from water pumped from the Petaluma River for various dust suppression purposes. Potable water needs for project employees and fire department personnel would be served by an existing water connection from the North Marin Municipal Water District pipeline that runs along the westerly side of the property. A large portion of the project site would remain unpaved to facilitate groundwater recharge.
- Hydrology and Water Quality, 8.e - The Initial Study determined that the project would not create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. The project would be required to provide drainage swales and/or other Best Management Practices along the perimeter of the property to filter and retain contaminants that are present in any stormwater before they enter the drainage ditches or the wetlands.
- Hydrology and Water Quality, 8.i - The Initial Study determined that the project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam because all structures would have finished floors at least one foot above the 100 year flood elevation.
- Hydrology and Water Quality, 8.j - The Initial Study determined that the project would not be inundated by seiche, tsunami, or mudflow. The likelihood of a tsunami or seiche occurring is rare due to the distance from the open ocean; there likely would be adequate warning to allow employees to leave the property and seek high ground in the hills immediately to the west. Additionally, the property is located on relatively flat ground away from surrounding hillsides, and therefore it is not likely that the project site would be inundated by mudflow.
- Public Services, 13.a(i, ii, and v) - The Initial Study determined that the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities. As existing police and fire services are adequate, the construction of new facilities is not required in order to maintain acceptable service ratios, response times or other performance objectives for fire and police protection, and other public facilities. Additionally, the County Fire Marshal has reviewed the project and required that all buildings comply with fire safe standards and may require an on-site water storage tank and pump for use in fire suppression operations.
- Utilities and Service Systems, 16.a - The Initial Study determined that the project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. The project was reviewed by the County Environmental Health Officer who would require the submittal of an approved wastewater discharge permit from the Bay Area Regional Water Quality Control Board.
- Utilities and Service Systems, 16.c - The Initial Study determined that the project would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities.

The project includes a drainage swale on the perimeter of the site to capture and filter run-off from the pavement and processing areas and there is adequate carrying capacity in the drainage ditches to accommodate the increase in runoff.

- Utilities and Service Systems, 16.d - The Initial Study determined that the project would have sufficient water supplies available to serve the project from existing entitlements and resources, and new or expanded entitlements would not be needed. Potable water needs for project employees and irrigation needs would be served by an existing water pipeline connection from the North Marin Water District (NMWD). Although the site is outside of its territorial boundaries, NMWD has agreed to supply 4,452 gallons per day, shown as the historical entitlement when the water meter was connected. The projected demand for non-potable water would be 10,000 to 20,000 gallons per day, and would be provided by pumping from the River. Non-potable water demands would not require expansion of existing entitlements from NMWD, therefore would have a less-than-significant impact for Utilities.

D. LESS-THAN-SIGNIFICANT IMPACTS WITH MITIGATION

Less-than-significant impacts with implementation of recommended mitigation measures identified in the Initial Study related to the following (see discussion in Appendix A):

- Cultural Resources, 5.c - The Initial Study determined that the project has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature because unknown paleontological resources could occur on the site. To mitigate this potential impact the following mitigation measure is proposed: If paleontological materials are discovered during project construction, construction would cease in the immediate vicinity of the find until a qualified archaeologist or paleontologist is consulted to determine the significance of the find, and has recommended appropriate measures to protect the resource. Further disturbance of the resource would not be allowed until those recommendations deemed appropriate by the County have been implemented.
- Cultural Resources, 5.d - The Initial Study determined that the project has the potential to disturb any human remains, including those interred outside of formal cemeteries because unknown resources could be encountered during project construction. To mitigate this potential impact the following mitigation measure is proposed: If human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the County coroner shall be immediately notified. If the remains are determined by a qualified archaeologist and/or paleontologist to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

E. POTENTIALLY SIGNIFICANT IMPACTS REQUIRING FURTHER ANALYSIS

The following summarizes impacts that were identified in the Initial Study as potentially significant and requiring further analysis in this EIR (see discussion in Appendix A):

- Aesthetics, 1.a - The Initial Study determined that the project has the potential to have a substantial adverse impact on a scenic vista because the project site is located along a County designated scenic corridor (Petaluma Boulevard South/Highway 101). Proposed structures present a potentially significant visual impact to the freeway, to surrounding residences and to the users of the park along the River. The equipment and materials storage could be visually intrusive and the proposed landscape screening could be inadequate. In addition, the introduction of heavy landscaping and/or berming with landscaping along the freeway could result in the elimination of the view corridors from the freeway to the River. Refer to Section V.A of this EIR.
- Aesthetics, 1.c - The Initial Study determined that the project has the potential to substantially degrade the existing visual character or quality of the site and its surroundings because the proposed project would have a potentially significant visual impact as noted above. Refer to Section V.A of this EIR.
- Aesthetics, 1.d - The Initial Study determined that the project has the potential to create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. The property is currently vacant and any new use or facility would introduce additional light and glare in the area. In addition, the potential for significant nighttime operations, especially night lights for parking, security, circulation and safety, could result in potentially significant impacts to the existing visual character of the area. Refer to Section V.A of this EIR.
- Air Quality, 3.a - The Initial Study determined that the project has the potential to conflict with or obstruct implementation of the applicable air quality plan because the proposed project is not entirely consistent with the existing land use designation and a General Plan Amendment is required. Refer to Section V.B of this EIR.
- Air Quality, 3.b - The Initial Study determined that the project has the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. The proposed asphalt batch plant may produce significant stationary equipment emissions, process pollutants, odors from the mixing of the oils and tar to create asphalt and odors from the manufacturing of rubberized asphalt. Mobile sources for this project are primarily diesel truck traffic and the use of heavy equipment for the loading and sorting of aggregates as well as the barges on the River. Refer to Section V.B of this EIR.
- Air Quality, 3.c - The Initial Study determined that the project has the potential to result in a cumulatively considerable net increase of any criteria pollutant. The Bay Area is considered a non-attainment area for ozone under both the Federal Clean Air Act and the California Clean Air Act. The Bay Area is also considered a non-attainment area for PM₁₀ under the California Clean Air Act. Although ozone and small particulate (PM₁₀) concentrations are almost always below air quality standards in the Sonoma Valley, emissions from the area could be contributing to air quality violations in other parts of the Bay Area. The proposed project has the potential to violate applicable federal or state ambient air quality standards due to PM₁₀ (fine particulate matter) in the form of dust emissions from the grading and handling of aggregate and recycled materials may occur during construction and operation of the proposed project. Refer to Section V.B of this EIR.
- Air Quality, 3.d - The Initial Study determined that the project has the potential to expose sensitive receptors to substantial pollutant concentrations. The proposed asphalt batch plant may produce

significant stationary equipment emissions, process pollutants, odors from the mixing of the oils and tar to create asphalt and odors from the manufacturing of rubberized asphalt. Mobile sources for this project are primarily diesel truck traffic and the use of heavy equipment for the loading and sorting of aggregates as well as the barges on the River. Based on the proximity of residential uses to this site, these air quality impacts could be potentially significant. Refer to Section V.B of this EIR.

- Air Quality, 3.e - The Initial Study determined that the project has the potential to create objectionable odors that could affect people because the proposed project is an asphalt batch plant that would manufacture rubberized asphalt directly adjacent to several homes along the Petaluma River. Refer to Section V.B of this EIR.
- Biological Resources, 4.a - The Initial Study determined that the project has the potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Eight special-status animal species were identified as having the potential to occur on or within the vicinity of the project site. Additionally the project is proposing a new barge off-loading facility on the Petaluma River which has a number of federal and state listed fish species. Refer to Section V.C of this EIR.
- Biological Resources, 4.b - The Initial Study determined that the project has the potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service because the Petaluma River and 11.69 acres identified on the site are subject to U.S. Army Corps of Engineers (Corps) jurisdiction pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899. Refer to Section V.C of this EIR.
- Biological Resources, 4.c - The Initial Study determined that the project has the potential to have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. There is a total of 11.69 acres of jurisdictional wetland on the site, including coastal brackish marsh habitat and seasonal wetlands. There is the potential for approximately 1.73 acres on the upland portion and the small barge loading area in the River to be impacted. Refer to Section V.C of this EIR.
- Biological Resources, 4.d - The Initial Study determined that the project has the potential to interfere substantially with the movement of native resident or migratory fish, wildlife species, established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Eight special-status animal species were identified as having the potential to occur on or within the vicinity of the project site. Refer to Section V.C of this EIR.
- Biological Resources, 4.e - The Initial Study determined that the project has the potential to conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance. The proposed pier for the project is located in a Biotic Resource Overlay Zone, which is designed to protect biological resources. Refer to Section V.C of this EIR.

- Cultural Resources, 5.b - The Initial Study determined that the project has the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5. The site has been used for over 100 years as a trading and commercial zone and it is likely to contain additional artifacts from that time period, not to mention possible Native American artifacts. Refer to Section V.D of this EIR.
- Geology and Soils, 6.a(ii) - The Initial Study determined that the project has the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. This could be because the majority of the site is located on unconsolidated alluvium and terrace deposits that are from 0 to 300 feet deep with increased shaking hazards depending on the thickness of the alluvium and the depth of groundwater. Refer to Section V.E of this EIR.
- Geology and Soils, 6.a(iii) - The Initial Study determined that the project has the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure. This could include liquefaction because the majority of the site is located on unconsolidated alluvium and terrace deposits that are from 0 to 300 feet deep with increased shaking hazards depending on the thickness of the alluvium and the depth of groundwater. Refer to Section V.E of this EIR.
- Geology and Soils, 6.c - The Initial Study determined that the project has the potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. This could potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse because the majority of the site is located on unconsolidated alluvium and terrace deposits that are from 0 to 300 feet deep with increased shaking hazards depending on the thickness of the alluvium and the depth of groundwater. Refer to Section V.E of this EIR.
- Hazards and Hazardous Materials, 7.a - The Initial Study determined that the project has the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed facility would store oils, tars, and recycled tires in crumb form related to the production of rubberized asphalt and would maintain an above ground fuel tank for the heavy equipment used to move aggregates. Refer to Section V.F of this EIR.
- Hazards and Hazardous Materials, 7.b - The Initial Study determined that the project has the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The proposed facility would store oils, tars, and recycled tires in crumb form related to the production of rubberized asphalt and would maintain an above ground fuel tank for the heavy equipment used to move aggregates. Refer to Section V.F of this EIR.
- Hydrology and Water Quality, 8.c - The Initial Study determined that the project has the potential to substantially alter the existing drainage pattern of the site or area through the alteration of the course of a stream or river. This could result in substantial erosion or siltation on or off the site during construction, as potential erosion and sediment transfer may result due to the removal of ground cover and the grading process. Refer to Section V.G of this EIR.

- Hydrology and Water Quality, 8.d - The Initial Study determined that the project has the potential to substantially alter the existing drainage pattern of the site or area. This would include the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off the site because increased impervious surfaces would increase the rate and the amount of storm water runoff. Refer to Section V.G of this EIR.
- Hydrology and Water Quality, 8.f - The Initial Study determined that the project has the potential to otherwise substantially degrade water quality. Refer to Section V.G of this EIR.
- Hydrology and Water Quality, 8.h - The Initial Study determined that the project has the potential to place structures within a 100-year flood hazard area, which could impede or redirect flood flows. Refer to Section V.G of this EIR.
- Land Use and Planning, 9.b - The Initial Study determined that the project has the potential to conflict with applicable land use plans, policies, and regulations of the agencies with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. The project potentially conflicts with criteria 1, 5 and 7 required to change the General Plan land use designation to Limited Industrial. In addition, the project conflicts with the Petaluma Dairy Belt Specific Plan Land Use designation (Limited Commercial). Refer to Section V.H of this EIR.
- Noise, 10.a - The Initial Study determined that the project has the potential to expose persons to generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. This would include barge off-loading of aggregates at any time of the day, the conveyance of these materials to stockpiles, the production of asphalt and recycling operations, the loading of trucks with aggregates and asphalt, and the movement of trucks and equipment on the site. Additionally, the proposed project would include facilities for the San Antonio Volunteer Fire Department for response drills and equipment storage. Refer to Section V.I of this EIR.
- Noise, 10.b - The Initial Study determined that the project has the potential to expose persons to or generation of excessive groundborne vibration or ground borne noise levels because the construction of the pier for the off-loading of barges requires the installation of piles into the River. The residences directly adjacent to the project site would be effected by project noise levels. Refer to Section V.I of this EIR.
- Noise, 10.c - The Initial Study determined that the project has the potential to substantially and permanently increase ambient noise levels in the project vicinity above levels existing without the project as noted above. Refer to Section V.I of this EIR.
- Noise, 10.d - The Initial Study determined that the project has the potential to substantially and temporarily or periodically increase ambient noise levels in the project vicinity above levels existing without the project. The construction of the proposed project would result in a significant temporary increases in noise levels. Based on the physical proximity of the residences along the River, off-loading of aggregates by barge, batch plant, recycling, truck loading, and truck idling, noise

impacts may not be adequately mitigated through simple sound barriers and noise attenuation measures on the equipment. Refer to Section V.I of this EIR.

- Transportation/Traffic, 15.a - The Initial Study determined that the project has the potential to cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system. There could be safety issues between trucks, emergency vehicles, and the passenger vehicles associated with the adjacent off-site residences that travel through the project site to access their properties. Additionally, when future plus project conditions were studied, the southbound 101 ramp intersection dropped to LOS F. Refer to Section V.J of this EIR.
- Transportation/Traffic, 15.b - The Initial Study determined that the project has the potential to exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways. Added traffic volumes would lower the service levels on the southbound 101 ramp intersection with Petaluma Boulevard South to LOS F during the peak A.M. hour at build-out of Petaluma's General Plan (2030). Refer to Section V.J of this EIR.

