

Project Information

Project Name: Downtown-River-Apartments

HEROS Number: 900000010289247

Point of Contact: Martha Cheever

Consultant (if applicable): Bay Desert, Inc.

Point of Contact: Cinnamon Crake

Project Location: 35 E Washington St, Petaluma, CA 94952

Additional Location Information:

Downtown River Apartments is an existing 81 unit affordable apartment building with approximately 5,595 square feet of ground floor commercial space located at 35 East Washington Street, Petaluma, Sonoma County, California 94952. The site is comprised of two contiguous parcels that total 2.22 acres (APNs 007-121-025-000 and 007-121-027-000). One parcel contains the building the other is designated "unusable land" due to proximity to the Petaluma River (adjacent). Much of the commercial space has remained vacant for many years. The proposal would include conversion of 3,526 square feet of the commercial space into living space in the form of six accessory dwelling units (ADUs). The proposal would rehabilitate the space into five (5) one-bedroom units of 523 square feet; and one two-bedroom unit of 811 square feet. After rehabilitation, the project would contain 87 residential units and approximately 2,000 square feet of commercial space. The site is located in downtown Petaluma, adjacent to the Petaluma River and surrounded with industrial, commercial, and retail uses.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Downtown River Apartments is an existing 81 unit affordable apartment building with approximately 5,595 square feet of ground floor commercial space located at 35 East Washington Street, Petaluma, Sonoma County, California 94952. The site is comprised of two contiguous parcels that total 2.22 acres (APNs 007-121-025-000 and 007-121-027-000). One parcel contains the building the other is designated "unusable land" due to proximity to the Petaluma River (adjacent). Much of the commercial space has remained vacant for many

years. The proposal would include conversion of 3,526 square feet of the commercial space into living space in the form of six accessory dwelling units (ADUs). The proposal would rehabilitate the space into five (5) one-bedroom units of 523 square feet; and one two-bedroom unit of 811 square feet. After rehabilitation, the project would contain 87 residential units and approximately 2,000 square feet of commercial space. The existing restaurant tenant will remain, and will not be displaced by the project. There is no expansion of the building footprint, however some window and door modifications along the building frontage will be needed. No excavation or trenching will be required to complete the project. No additional parking will be required based on the ADU regulations; however, there are currently approximately eight (8) parking spaces dedicated to the commercial space that will be available for the new units. See attached project description.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose of the proposal is to preserve existing housing units while creating six (6) additional units within unused commercial space with this rehabilitation project. According to the 2020 U.S. Census, Sonoma County had a population of 488,863. The population of Petaluma was 59,776 as of the 2020 Census. Sonoma County's population is expected to grow 24% to 598,460 in year 2040. According to the Association of Bay Area Governments (ABAG), Sonoma County Housing Needs Allocation 2015 to 2023, the City of Petaluma should add 745 new units by 2023 in order to meet the needs for affordable housing. According to the City of Petaluma Housing Element 2023-2031, the City of Petaluma will need a total 1,910 new units to meet affordable housing needs. The project will provide safe affordable housing of high quality to those in need; establish stability and opportunity in the lives of its residents; and foster communities that allow people from all ethnic, social and economic backgrounds to live in dignity, harmony and mutual respect. In light of the conditions brought about by the Covid19 pandemic, the economy in the Bay Area is expected to be negatively impacted. This may result in uneven job growth throughout the region, increased income disparity, and high foreclosure rates. At the same time, housing costs have risen for renters and, to a lesser degree, for home buyers close to the region's job centers. Bay Area communities face these challenges at a time when there are fewer public resources available than in past decades for investments in infrastructure, public transit, affordable housing, schools, and parks. The addition of six affordable housing units, and the preservation of 81 existing units, will lessen the stresses on affordable housing in the area. Source: (1) (2) (3) (4)

Existing Conditions and Trends [24 CFR 58.40(a)]:

Existing Conditions Downtown River Apartments is an existing 81 unit affordable apartment building with approximately 5,595 square feet of ground floor commercial space located at 35 East Washington Street, Petaluma, Sonoma County, California 94952. The site is comprised of two contiguous parcels that total 2.22 acres (APNs 007-121-025-000 and 007-121-027-000). One parcel contains the building the other is designated "unusable land" due to proximity to the Petaluma River (adjacent). Much

of the commercial space has remained vacant for many years. The proposal would include conversion of 3,526 square feet of the commercial space into living space in the form of six accessory dwelling units (ADUs). The proposal would rehabilitate the space into five (5) one-bedroom units of 523 square feet; and one two-bedroom unit of 811 square feet. After rehabilitation, the project would contain 87 residential units and approximately 2,000 square feet of commercial space. The site is located in downtown Petaluma, adjacent to the Petaluma River and surrounded with industrial, commercial, and retail uses. Trends In addition to addressing the new construction needs as enumerated in the RHNA, state statute requires that each jurisdiction quantify its housing objectives for new construction, rehabilitation, and conservation/preservation to address the needs of extremely low income, very low and low income households in their Housing Element of the General Plan. The City of Petaluma's projections for year 2023-2031 to meet those needs include 499 Very Low Income units, 288 Low-income units, 313 Moderate Income units and 810 for Above Moderate Income earners in the City. The City implements its local Inclusionary Housing program that requires 15 percent of the units in new development (of five or more units) to be rented or sold at prices affordable to lower and moderate income households. To facilitate housing development, the City will evaluate the Inclusionary Housing program to: assess the threshold for applying the inclusionary requirements, including the appropriate unit threshold for in-lieu options; and establish specific alternative options for fulfilling the inclusionary housing requirements, such as payment of an in-lieu fee, donation of land, acquisition/rehabilitation and deed restriction of existing housing, preservation of affordable housing at risk of converting to market rate, or allowance of ADUs in multi-family development to count toward the requirement. A major constraint to affordable housing development is the lack of funding. The City has established a Local Housing Trust Fund but has limited sources of revenue for the Trust Fund. Currently, available sources include fees generated from the Inclusionary Housing in-lieu fee, Housing-Commercial Linkage Fee, and Permanent Local Housing Allocation. With the City's focus on on-site production of affordable units, the In-Lieu fee is not a significant source of revenue for the Trust Fund. The City is exploring participation in the Joint Powers Authority (JPA) with the City of Santa Rosa and the County of Sonoma. The JPA was created with the PG&E settlement funding from the 2017 and 2018 wildfires. The City will explore other funding sources, including: the General Fund; Transient Occupational Tax; Short-Term Rental registration fee; Vacant Home Tax (imposing a tax on homes that are unoccupied for an extended period); and an Employer Fee (requiring major employers to contribute to affordable housing). Source: (3) (5) The trends outlined above will continue in the absence of the project. The project will help meet housing goals but adding units in underutilized commercial space of an existing building, at an existing affordable housing project site.

Maps, photographs, and other documentation of project location and description:

[SKD-006 New Units 220623.pdf](#)

[Project Description - Downtown River Apartments FINAL.pdf](#)

[Map.pdf](#)

[Map.pdf](#)

[photo.pdf](#)

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
TBD	Public Housing	Project-Based Voucher Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$2,409,600.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$45,513,085.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. Source Documentation: (5) (6) (7)

<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. The majority of the site is located in the 500-year floodplain. The project does not constitute a Critical Action. No mitigation is needed. The 8-Step Process is not invoked. Source Documentation: (9)</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. The Bay Area Air Quality Management District (BAAQMD) is in attainment for all National Air Quality Standards except for Ozone and Particulate Matter (PM10 and PM2.5). The project is the rehabilitation of an existing building. Rehabilitation does not require additional compliance with the Clean Air Act (CAA) because no development is created that would contribute to air pollution (40 CFR s. 93.153[c] [2])). This project does not require further review for compliance with federal air quality standards. Exposure of Residents to Toxic Air Contaminants (TACs) There are no freeways or arterial roadways within 1,000 feet to analyze for impacts to residents. No mitigation is needed. Source Documentation: (10) (11)</p>

<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. The project is rehabilitation of the interior of an existing building. There is a Local Coastal Program for western Sonoma County that lies along the California coastline. The site is located over 18 miles from the coast. A Coastal Development Permit is not required. Source Documentation: (12)</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project does not involve acquisition of real property or new construction; therefore, a Phase I Environmental Site Assessment was not warranted. The project will convert interior space of an existing building from commercial space into additional residential units, without ground disturbance or new construction. A current EDR Radius Map report was ordered from Environmental Data Resources (EDR) in October 2022. A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E1527-21), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E 2247-16), the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E 1528-14) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate. Subject Property The subject/target property was listed on HAZNET, NPDES and CIWQS databases for construction-</p>

		<p>related activities - appropriate disposal of contaminated soil, construction runoff and the construction of storm drain facilities, respectively. None of the six listings for the target property represent an existing hazardous condition at the site. Adjacent properties The site is located in downtown Petaluma, in an area of industrial, commercial, retail and residential uses. There are numerous businesses, operations, and historical uses listed on the EDR report: 33 records within 1/8 mile; 222 within 1/8 to 1/4 mile; 131 within 1/4 to 1/2 mile away; and 19 between 1/2 mile to a mile away. The site is served with potable water by the City of Petaluma. As a rehabilitation project that properly disposed of contaminated soil prior to constructing the building that currently exists on the site, and that will be rehabilitated as part of this project, there is no indication that any offsite locations listed on regulatory databases present any current hazard to residents of the site. Lead-based Paint and Asbestos-containing Building Materials The subject building was constructed in 2005; therefore it is assumed that lead-based paint and asbestos-containing building materials are absent. Rehabilitation will not disturb and hazardous building materials, as none are present. Source Documentation: (5) (13)</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act. The nature of the project is rehabilitation of an existing multifamily affordable housing project. No trees will be removed as part of the project. The project has no</p>

		<p>potential to effect listed species or their habitat. Source Documentation: (14)</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements. Existing ASTs There are 23 existing Above Ground Storage Tanks (ASTs) within one mile of the project site. Two are within 1/8 of a mile; four are between 1/8 and 1/4 mile away; two are between 1/4 mile and 1/2 mile away; and 15 ASTs lie between 1/2 mile and one mile away from the site. See AST Exhibit/Table 1 (attached) for more detail. Of the 23 existing Above Ground Storage Tanks (ASTs), 16 tanks are covered by 24 CFR 51 C. HUD's Acceptable Separation Distance Tool was used to calculate the blast overpressure and thermal radiation for both buildings and people for each of the 16 sites (see attachments). The subject property is well outside all of the distances calculated. No mitigation is required. Planned ASTs There are numerous development projects in various stages of planning and approval listed on the City of Petaluma, Major Development Projects website accessed on November 3, 2022 (attached). Most of the projects appear to be multifamily and single family housing. There are some commercial and retail projects near the project site; however, none would have operations that would require ASTs with flammable hazards; for example, a winery is proposed, but ASTs containing wine would not present an explosive threat to residents of the subject property. Conclusion The building and residents are not within any blast radius of any current or</p>

		<p>planned Above-ground Storage Tank. Source Documentation: (13) (15) (16) (17)</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. Source Documentation: (18)</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project is located in a 500-year floodplain. Based on the project description this project is not a critical action, so an 8-Step process is not required. The project is in compliance with Executive Order 11988. Source Documentation: (9)</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. Undertaking Downtown River Apartments is an existing 81 unit affordable apartment building with approximately 5,595 square feet of ground floor commercial space located at 35 East Washington Street, Petaluma, Sonoma County, California 94952. The site is comprised of two contiguous parcels that total 2.22 acres (APNs 007-121-025-000 and 007-121-027-000). One parcel contains the building the other is designated "unusable land" due to proximity to the Petaluma River (adjacent). Much of the commercial space has remained vacant for many years. The proposal would include conversion of 3,526 square feet of the commercial space into living space in the form of six accessory dwelling units (ADUs). The proposal would rehabilitate the space into five (5) one-bedroom units of 523 square feet; and one two-bedroom unit of 811 square feet. After rehabilitation, the project would contain 87 residential</p>

		<p>units and approximately 2,000 square feet of commercial space. The existing restaurant tenant will remain, and will not be displaced by the project. There is no expansion of the building footprint, however some window and door modifications along the building frontage will be needed. No excavation or trenching will be required to complete the project. No additional parking will be required based on the ADU regulations; however, there are currently approximately eight (8) parking spaces dedicated to the commercial space that will be available for the new units. The scope of work for rehabilitation of Downtown River Apartments includes, but is not limited to: * Replacement of north facade including selective removal and replacement of stucco and interior work for 15 units to repair dry rot in existing units; * Window replacement/repair; * Installation of increased ventilation including fresh air intake, venting and exhausting; * Replacement of the gas boiler with a heat pump for water heating; * Common area upgrades including interior lighting and carpeting; * Exterior lighting upgraded to LED; * Playground will be upgraded with new, ADA-compliant equipment and new surfacing; * Blacktop basketball court to be re-surfaced; and * Solar panels will be removed and replaced with new.</p> <p>Area of Potential Effects (APE) The project is rehabilitation of an existing four-story building constructed in 2005. The majority of the scope of work will occur in the interior; exterior work consists of stucco removal and replacement. The Area of Potential Effect is therefore limited to the subject property itself. No ground disturbance will occur as part of the project. There is no APE for archaeology and consultation</p>
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		<p>with Native American tribes is not invoked. Evaluation The subject building was constructed in 2005 and is therefore 17 years of age as of the writing of this letter. A formal evaluation is not warranted. The subject property and APE do not contain any historic properties. No historic properties will be affected by the undertaking and no further study is warranted. Conclusions There are no historic properties identified within the Area of Potential Effects. Finding On November 7, 2022, the Agency Official for the project, Sonoma County Community Development Commission provided a description of the Undertaking, developed an Area of Potential Effects, and made a finding of no historic properties affected by the Undertaking and provided this information to the State Historic Preservation Officer for Section 106 consultation via E-mail per COVID instructions. On December 8, 2022, 30 days elapsed and the State Historic Preservation Officer did not object to the finding of no historic properties affected by the Undertaking. This concludes Section 106 consultation and no mitigation is needed. Source Documentation: (19) (20) (21) (22)</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>A Noise Assessment was conducted. The noise level was normally unacceptable: 72.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. HUD Noise Standards The HUD Noise standards for new construction are project sites that are exposed to a future noise environment of 65 dBA CNEL or less to be "Acceptable"; future noise of 65 dBA CNEL to 75 dBA CNEL to be "Normally Unacceptable"; and noise above 75 dBA CNEL to be "Unacceptable". For substantial rehabilitation projects, HUD</p>

		<p>encourages noise attenuation features, if needed. For rehabilitation projects that replace windows for example, HUD again encourages the applicant to use sound-rated assemblies for noise exposed areas. Existing Noise Environment HUD standards state that airports within 15 miles, railroads within 3,000 feet, and highways and arterial roadways within 1,000 feet be included in a noise analysis. The following noise sources were identified: * Petaluma Municipal Airport - 2.33 miles north-northeast * Freight and SMART rail operations - 1,275 feet East * East Washington Street - 60 feet The results of HUD's DNL Calculator Tool reveal that existing noise levels at the street-facing project facade along East Washington to be 71 dB CNEL. Future Noise Environment The project site is calculated to be exposed to a future noise environment of 72 Ldn, which is considered "Normally Unacceptable" by HUD for new construction. However, it is unknown by the preparer of this report what the original sound attenuation features were constructed into the project. It is likely that to meet City of Petaluma building requirements for indoor noise at 45 dB or less, features were included to meet local code requirements for residential construction. However, that information was not relied upon in this analysis. Noise Abatement The existing and future noise exposure along the East Washington Street frontage where the commercial space to be converted is located, is above HUD's "Acceptable" noise level of 65 dB CNEL. Therefore, some mitigation is needed, and HUD encourages that windows be upgraded to reduce interior noise along East Washington Street. N1. For new residential units that face East</p>
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		Washington Street and will have the existing commercial space windows replaced, the applicant shall replace windows with sound rated assemblies that achieve STC 27 or better. Source Documentation: (23) (24) (25) (26) (27) (28) (29)
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. Source Documentation: (30)
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. The project site is located in an urbanized area. There are no Federally protected wetlands on the site. The site is adjacent to the Petaluma River, listed on the National Wetlands Inventory; however, a parcel of 'unusable' land separate the parcel that contains the subject buildings and the riparian area. The project is rehabilitation of an existing building and therefore will not affect any federally protected wetlands. Any site work that requires a Permit from the City of Petaluma will also include Standard Permit Conditions that will prevent any siltation, runoff or erosion to be directed toward the River. No further consultations are required. Source Documentation: (31)
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. Source Documentation: (32)
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Adverse environmental impacts are not disproportionately high for low-income

		<p>and/or minority communities. The project is in compliance with Executive Order 12898. An environmental justice population is considered to be a local community with a higher representation of people either below the poverty line or with a higher representation of ethnic minorities compared to a reference population, which is often the population of the local jurisdiction performing the review. For the purpose of this analysis, the local population is considered to be the future residents of the project site, while the regional population is represented by the City of Petaluma as a whole. The 2020 United States Census reported that Petaluma had a population of 59,776. The population density was 4,146.8 people per square mile. The racial makeup of Petaluma was 76.1% White, 1.3% African American, 0.8% Native American, 4.4% Asian, 0.1% Pacific Islander, 7% from two or more races. Hispanic or Latino of any race were 21.7%. The average median income in 2020 was \$92,762 with 6.6% of the population in poverty. According to CalEnviroScreen the area is not a disadvantaged community that is burdened by adverse effects from pollution. CalEnviroScreen is a screening tool that evaluates the burden of pollution from multiple sources in communities while accounting for potential vulnerability to the adverse effects of pollution. CalEnviroScreen ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors and prevalence of certain health conditions. Data used in the CalEnviroScreen model come from national and state sources. Of the 12 Environmental Justice Indexes reported by US Environmental</p>
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		<p>Protection Agency, all were below the 50% state percentile. Because the project would introduce an environmental justice population to the area through the development of affordable housing, this analysis further considered project impacts and their potential to disproportionately affect the project's introduced environmental justice population. Noise: The site is exposed to noise above HUD's Acceptable standard of 65 dB CNEL. The existing or future noise is 'Normally Unacceptable', but not in the 'Unacceptable' zone (above 75 dB CNEL). The noise is similar to other residential housing projects in the downtown area. The noise exposure does disproportionately affect environmental justice populations. The developer shall install windows to ensure interiors will be 45 dB CNEL or less. Conclusion The project will not raise environmental justice issues and has no potential for new or continued disproportionately high and adverse human health and environmental effects on minority or low-income populations. The project will enable unused space to be utilized to provide additional housing units within an existing building in an area not adversely affected by pollution. There is a small benefit in this regard. Source Documentation: (33) (34) (35)</p>
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The project is rehabilitation of an existing affordable housing apartment building to convert unused ground-floor commercial space into additional apartment units - thereby increasing the density from 81 to 87 units. There is no change to the size and massing of the building. There is no change in land use that would require discretionary approvals from the City of Petaluma. The project represents a higher utilization of existing, unused space. There is a benefit in this regard. Source Documentation: (5)	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The project is rehabilitation of an existing building on a developed site. The slope, drainage or storm drain system will not be altered in any way. Runoff will not be increased by the project. There is no impact in this regard. Source Documentation: (5)	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The project will not itself create a risk of explosion, release of hazardous substances or other dangers to public health. The project is not located near any hazardous operations. Source Documentation: (5)	
SOCIOECONOMIC			
Employment and Income Patterns	1	No permanent existing employees would be affected by the project. Construction of the project site would result in temporary construction job growth at the project site but this is a small number that is anticipated to be accommodated by the existing	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>employment pool. No impact is anticipated from the project on employment and income within the project area. The project site is located along a transit and commercial corridor, placing residents in a location convenient to both transit and possible local employment. A small benefit has been identified. Source Documentation: (5) (6)</p>	
<p>Demographic Character Changes / Displacement</p>	<p>2</p>	<p>Demographics The project would not induce substantial population growth that would not otherwise have occurred. No impact is expected because of the project, as it represents no significant change to the demographics of the area. The project by its definition is to provide affordable housing for individuals and families. The increase in residential population resulting from the proposed project would not be substantial and is within the Association of Bay Area Governments' (ABAG) 2050 Population projections in their Plan Bay Area 2050 Growth Pattern. Regional Plan Bay Area 2050 anticipates a 24% increase in households in Sonoma County by 2040. The proposal will add six (6) accessory dwelling units (ADUs) within an existing building - five one-bedroom units and one two-bedroom unit. Per HUD, the maximum number of residents in the new units is 15 persons. The additional 15 persons housed in this affordable project represents a less than significant impact. The project would not create a significant change</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>to the demographics of the area. Displacement The Uniform Relocation Act (URA), passed by Congress in 1970, establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects. Section 205 of the URA requires that, "Programs or projects undertaken by a federal agency or with federal financial assistance shall be planned in a manner that (1) recognizes, at an early stage in the planning of such programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of such problems in order to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion." The project will convert unused/unleased existing commercial space to residential units. There is a restaurant that occupies one of the commercial spaces, and they will remain in that space. No business or residents will be displaced by the proposal. Source Documentation: (1) (36) (37)</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Environmental Justice EA Factor	1	<p>Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The project is in compliance with Executive Order 12898. An environmental justice population is considered to be a local community with a higher representation of people at either below the poverty line or with a higher representation of ethnic minorities compared to a reference population, which is often the population of the local jurisdiction performing the review. For the purpose of this analysis, the local population is considered to be the future residents of the project site, while the regional population is represented by the City of Petaluma as a whole. The 2020 United States Census reported that Petaluma had a population of 59,776. The population density was 4,146.8 people per square mile. The racial makeup of Petaluma was 76.1% White, 1.3% African American, 0.8% Native American, 4.4% Asian, 0.1% Pacific Islander, 7% from two or more races. Hispanic or Latino of any race were 21.7%. The average median income in 2020 was \$92,762 with 6.6% of the population in poverty. According to CalEnviroScreen the area is not a disadvantaged community that is burdened by adverse effects from pollution. CalEnviroScreen is a screening tool that evaluates the burden of pollution from multiple sources in communities while accounting for potential vulnerability to the adverse effects of pollution.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>CalEnviroScreen ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors and prevalence of certain health conditions. Data used in the CalEnviroScreen model come from national and state sources. Of the 12 Environmental Justice Indexes reported by US Environmental Protection Agency, all were below the 50% state percentile. Because the project would introduce an environmental justice population to the area through the development of affordable housing, this analysis further considered project impacts and their potential to disproportionately affect the project's introduced environmental justice population. Noise: The site is exposed to noise above HUD's Acceptable standard of 65 dB CNEL. The existing or future noise is 'Normally Unacceptable', but not in the 'Unacceptable' zone (above 75 dB CNEL). The noise is similar to other residential housing projects in the downtown area. The noise exposure does disproportionately affect environmental justice populations. The developer is encouraged to ensure interiors will be 45 dB CNEL or less. Conclusion The project will not raise environmental justice issues and has no potential for new or continued disproportionately high and adverse human health and environmental effects on minority or low-income populations. The project will enable</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>unused space to be utilized to provide additional housing units within an existing building in an area not adversely affected by pollution. There is a small benefit in this regard. Source Documentation: (33) (34) (35)</p>	
COMMUNITY FACILITIES AND SERVICES			
<p>Educational and Cultural Facilities (Access and Capacity)</p>	2	<p>Educational Facilities The project by its definition is to provide an additional six affordable housing units with a maximum population of 15 persons. The target population may have school-aged children living at home. The project site is located within the Central Petaluma Specific Plan area. An Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA) for the Specific Plan in 2003 . The following is an analysis from the EIR regarding school and educational facilities. The City of Petaluma is served by eight school districts, the largest of which is the Petaluma Unified School District. All the City's secondary schools are in the Petaluma Unified School District. Six of the remaining seven school districts are located in rural areas of the city and house only one or two elementary schools each. The Specific Plan area is within the boundaries of the Petaluma Unified School District (PUSD), which provides educational services for grades K-6 through its elementary schools, and for grades 7-12 through its secondary Junior high and senior high) schools. Elementary school students from the Specific Plan area attend McKinley Elementary School</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>on Ellis Street, McNear Elementary School on Sunnyslope Avenue, and Valley Vista Elementary on North Webster Street. Junior high school students from the Specific Plan area attend Petaluma Junior High School (grades 7-8) located on BanJam Way. High school students attend Petaluma High School (grades 9-12), located at 10th and English Street. In the school year 2000-2001, only two of Petaluma's elementary schools and no secondary schools were over capacity. Overall enrollment in Petaluma schools (including all eight school districts) totals 94 percent of capacity. The Santa Rosa Junior College (SRJC) operates a 40-acre satellite community college campus in Petaluma. The SRJC Petaluma campus had 6,000 students enrolled from 2000-2001, and planned to increase enrollment to its capacity of 6,500 in 2001-2002. The University of Northern California maintains a much smaller Petaluma campus with an enrollment capacity of 100 students. Enrollment of these two schools was expected to reach capacity by 2002. The SRJC is planning a facility expansion to the Petaluma Center that would nearly double its existing capacity to 12,500 students. The PUSD and SRJC obtain funding from several different sources to continue providing adequate school services as the City grows. There is currently a state-authorized school impact fee levied by the PUSD on new commercial and residential development within the</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>district, currently set at \$2.05/square foot for residential units and \$0.33/square foot for commercial and industrial space. The fees collected through this system are not considered adequate.¹ Alternate funding sources come from state and district bond issues, Mello-Roos Community Facilities District "Special Taxes", general fund money, redevelopment funds, and state grants. The EIR determined that no significant school services related environmental impacts were identified and no mitigation was needed. The six units created by the project have already been accounted for in the Specific Plan that applies to it. The project in itself would not cause the need for the construction of new schools. Cultural Facilities Sonoma County and the larger San Francisco Bay Area a is rich in cultural facilities. The project is conveniently located in downtown Petaluma and near high-quality transit, allowing for access to cultural facilities nearby and outside of the immediate area. The additional 15 residents would not create significant increased demand for cultural facilities beyond that already a. The project represents an incremental demand for cultural facilities; impacts are considered less than significant. Source Documentation: (5) (6)</p>	
Commercial Facilities (Access and Proximity)	1	<p>The project site is within adequate and convenient distance to retail services that provide essential items such as food, medicine, banks and other convenience shopping.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Commercial facilities are in close proximity to the project site and are accessible by public transit or within walking distance. East Washington Street itself is a commercial corridor. Across East Washington Street from the site lies a grocery store, bank and other services. There are more than adequate commercial facilities within walking distance of the subject property. There is a small benefit in this regard. Source Documentation: (5) (6)</p>	
<p>Health Care / Social Services (Access and Capacity)</p>	<p>2</p>	<p>The nearest hospital is Petaluma Valley Hospital located at 400 North McDowell Blvd., two miles from the project site. Petaluma Valley Hospital offers residents access to 24-hour emergency care, critical care, medical and surgical services, outpatient surgical services, a birthing center, respiratory therapy and occupational/physical therapy services, laboratory and radiology services, and pulmonary rehabilitation services. The next closest hospital is Providence Santa Rosa Memorial Hospital, 1165 Montgomery Drive in Santa Rosa, approximately 17 miles north. There are numerous health care clinics, urgent care clinics and doctor's offices near the site and within a reasonable distance. Healthcare centers and clinics near the site include care center is Petaluma Health Center, 1179 North McDowell Blvd., Sutter Walk-in Care Petaluma, 411 North McDowell Blvd., St. Joseph Health Family Medicine, 905 E Washington Street, Casa Grande Clinic and others. The</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>County of Sonoma, Human Services department provides social services to the County and Petaluma. The following services are offered: *</p> <ul style="list-style-type: none"> * Apply for or renew health care benefits and CalFresh (SNAP/formerly food stamps) * Care for foster children and teens * Support for foster and adoptive parents * Protection abused or neglected children * Protection from abuse and neglect for seniors and dependent adults * In-home care for adults 60+ and disabled persons of all ages * Information and referral to services for adults 60+ and seniors * Support for U.S. military veterans filing benefit claims * Find a job or training to start a new career * Employers can find qualified workers * Report welfare scams or benefit fraud <p>Human Services operates the following offices: *</p> <ul style="list-style-type: none"> * Economic Assistance, 2550 Paulin Drive, Santa Rosa, and South County Center, 5350 Old Redwood Highway, Suite 100, Petaluma: 8 a.m.- 4 p.m., Monday-Friday. * Employment and Training Division, 2227 Capricorn Way, Suite 100, Santa Rosa: 8 a.m.-5 p.m., Monday-Friday. * Family, Youth and Children's Division, 1202 Apollo Way, Santa Rosa: 8 a.m.-5 p.m., Monday-Friday. * Adult and Aging Division, 3725 Westwind Blvd., Santa Rosa: Tuesdays and Wednesdays, 8 a.m.-5 p.m., Monday-Friday <p>All of the locations are accessible by either SMART or bus service. No adverse impacts to the delivery of healthcare or social services were identified as</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		result of the project. Source Documentation: (5) (6) (38) (39)	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The City of Petaluma contracts with Recology for recycling, organics, and solid waste services. The site and vicinity are already served with solid waste disposal and curb-side recycling services. An additional 15 persons will generate additional solid waste, but the increase is negligible. The project will not cause the need for additional landfill facilities nor impact the provision of existing services. There is no impact in this regard. Source Documentation: (5) (6) (40)	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	Petaluma's sewer utility collects, treats, and reuses or disposes of domestic, commercial and industrial wastewater generated by Petaluma and the unincorporated Sonoma County community of Penngrove. The wastewater collection system is the underground piping that transports raw (untreated) wastewater from businesses and residences to the treatment plant. This system consists of more than 195 miles of sewer collection pipes and nine pump stations. The wastewater is sent to the Ellis Creek Water Recycling Facility, where it is processed and recycled for irrigation or released into the Petaluma River. The additional interior residential units will not require sewer upgrades to implement. The project replaces existing/unused commercial space, so the net difference in waste water generated is negligible. Source Documentation: (5) (41)	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Water Supply (Feasibility and Capacity)	2	<p>Water Supplier Most of Petaluma's water is imported from the Russian River system, supplied by Sonoma Water. To supplement the imported water supply during water shortage periods and during peak summer demands, Petaluma utilizes local municipal groundwater wells. To conserve water and reduce current and future demands for potable water, the City provides recycled water to irrigate urban parks, schools, and public and private landscapes that historically used drinking water for irrigation. Additionally, the City has a robust water conservation program to help residents and commercial customers conserve water. In compliance with the California Water Code, the City updates and adopts its Urban Water Management Plan (UWMP) and submits it to the Department of Water Resources every 5 years. The UWMP looks at water supply and demand over a 20 year planning horizon, and provides information about the City's water supply sources, current and projected population, historical and projected water use, and water supply projections for drought conditions, like those residents are currently experiencing. As part of the UWMP, the City is required to prepare an updated Water Shortage Contingency Plan (Shortage Plan) every five years. The Shortage Plan defines water shortage levels and identifies corresponding actions the City implements to reduce demand under mild to severe water shortage</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>conditions. The City is currently in Stage 4 of the Shortage Plan, designed to reduce the City's water use by 30% through mandatory restrictions. The City's 2020 UWMP was adopted by City Council on June 7, 2021 and the Amended 2020 Shortage Plan was adopted by City Council on August 1, 2022. While Chapter 7 of the UWMP indicates supply would exactly meet demand during normal and multiple dry years, in fact more water would be available. Sonoma Water can store 225,000 AF of water in Lake Sonoma and can divert up to 75,000 AFY for water supply purposes under current water rights permits. However, supply volumes are shown to exactly meet demand to indicate that water would be stored in Lake Sonoma to meet future demands. Proposed Project The additional 15 residents will increase the demand for potable water at the site, however this increase is not significant and adequate water supply is available. Source Documentation: (2) (42) (43)</p>	
Public Safety - Police, Fire and Emergency Medical	2	<p>The project site is located within the Central Petaluma Specific Plan (CPSP) area. Some sections that follow quote the CEQA EIR conducted for the Plan in 2005. Sections have been updated where appropriate. Police All development within the Petaluma City limits is served by the Petaluma Police Department (PPD), which operates from the main police station at 969 Petaluma Boulevard North and an additional substation located in a storefront at 363 South McDowell</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Boulevard. Anticipated future buildout between the current City limit line and the City's Urban Growth Boundary will likely require new police facilities. The City is divided into four police beat areas which are defined by the four quadrants created by Washington Street (which runs east/west) and the Petaluma River (which runs north/south). The Specific Plan area is therefore partially within each of the City's four beats. Twenty-four-hour patrol service is provided within each of the City's four beats. The PPD includes 78 sworn police officers (including Sergeants, Lieutenants, Captains and the Chief), providing a service ratio of 1.4 sworn officers per 1,000 residents, which is higher than the nationally accepted standard service ratio of 1.25 officers per 1,000 residents. The PPD applies a recommended emergency response time of three minutes. The Police Department should continue to monitor the rate of additional police calls per year associated with the central area and the adequacy of response times. As warranted by the monitoring data, the City should provide additional officers and facilities (funded through the City's general fund). The City should also require Police Department review and approval of final project plans within the Specific Plan Area. Fire and Emergency Medical The City of Petaluma Fire Department (PFD) provides fire protection, fire suppression and emergency medical services to the Specific Plan area.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>The PFD responds to structural and wildfires, emergency medical service calls, and hazardous/toxic spills in the City. The PFD also has the responsibility to prepare the City for natural disasters, and serves as the main contact and conduit for Emergency Management Information. The PFD currently has approximately 48 uniformed firefighters at three stations, with 15 fulltime fire fighters on duty at any one time to respond to emergency situations, based on national standards for staffing requirements. The current ratio of firefighters to population is approximately 0.86 firefighters per 1,000 people. The Headquarters fire station, located at 198 D Street, is located near the southern boundary of the Specific Plan area. The Headquarters station is currently staffed by seven fire fighters and is equipped with two engines, one brush-fire truck and three ambulances. The PFD has prepared a five year Fire/Life Safety Plan, which also sets response time requirements for emergency medical services (EMS). The Plan sets the following EMS response time goals: 90 percent of urban responses within 8 minutes, 90 percent of semi-rural responses within 15 minutes, and 90 percent of rural responses within 30 minutes. Two of the PFD's three ambulances are kept staffed 24 hours a day. The PFD should continue to monitor the rate of additional fire or emergency medical service calls per year associated with the central area and</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>the adequacy of response times. As warranted by the monitoring data, the City should provide additional fire fighters and facilities (funded through the City's general fund). The City will also require Fire Department review and approval of final project plans within the Specific Plan area. Conclusion The Central Petaluma Specific Plan EIR did not note any significant impacts from the increase in residential units in the Plan area. There is no impact other than that already identified and planned for in the Specific Plan that applies to the site. No adverse impact was identified. Source Documentation: (44)</p>	
<p>Parks, Open Space and Recreation (Access and Capacity)</p>	<p>2</p>	<p>Public parks and recreation services are provided in Petaluma in the form of neighborhood parks, community parks, pocket parks, and school sites. Community park sites, which provide playfields and picnic areas for use by all City residents, total 109 acres citywide. Neighborhood parks, which provide grassy areas and tot lots, total 75 acres citywide. Pocket parks, which generally include very small tot lots, total 2 acres citywide. Petaluma is also set apart from the neighboring communities of Novato and Rohnert Park by a buffer of open space that totals approximately 163 acres. Existing parks adjacent to the Central Petaluma Specific Plan area include: Walnut Park, a 1 .5-acre central area neighborhood park at D Street and South Petaluma Boulevard immediately south of the Specific Plan area; McNear Landing, a 1 .3 acre park along the southern</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>bank of the Petaluma River at the southern boundary of the site; and Hill Plaza Park, a downtown park on South Petaluma Boulevard at Martha Street immediately west of the Specific Plan area. In addition, some designated open space exists along the Petaluma River immediately north and east of the Specific Plan area. Parks and recreation facilities within 1/2 mile of the Specific Plan area include: Oak Hill Park, 5-acre neighborhood park on Park Avenue northwest of the Specific Plan area; Wickersham Park, a 2.2-acre neighborhood park between G and H Streets and 4th and 5th Streets south of the Specific Plan area; the 3.5 acre Kenilworth Park at the corner of Payran Street and E. Washington Street (adjacent to the County Fairgrounds); and Miwok Park, a 1.6-acre park east of the Specific Plan area, north of Highway 116. Petaluma's current parks-to-population ratio is 3.4 acres of parkland per 1,000 residents. As outlined above, park facilities in west Petaluma are numerous, fairly evenly distributed, and provide visual variety to the urban environment. Nevertheless, total park provisions on the west side of the City are below the current City General Plan specified parkland per capita objective of 3.0 acres of community parks per 1,000 residents and 2.0 acres of neighborhood parks per 1,000 residents, for a total of 5.0 acres per resident. There are adequate parks and recreational opportunities to service residents.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		No adverse impact was identified. Source Documentation: (44)	
Transportation and Accessibility (Access and Capacity)	1	<p>Transportation The project site is conveniently located near high-quality transit in downtown Petaluma - the Petaluma Transit Mall (aka Petaluma SMART station) - lies 0.4 miles east of the site. The Transit Mall is a 2-minute drive, a 7-minute walk, and is accessible by bus. Several bus services operate in the area. Petaluma Transit provides local public transit bus service and Route 11 runs in front of the project site. Sonoma County Transit offers bus service around the County and is accessible from the project (routes 101 and 172) and the Transit Mall. Golden Gate Transit provides bus service from Santa Rosa to San Francisco and is also accessible from the Transit Mall. Sonoma-Marín Area Transit or SMART operates electric train service in the County and Marin County to the south. The Petaluma Transit Mall also houses the SMART Lakeville Station. Existing pedestrian, bicycle and transit facilities are expected to adequately serve the project. No adverse impacts to transportation were identified. The project will locate residents near transit; there is a benefit in this regard. Accessibility Site development, common use areas, access and adaptability of the units comply with the State's Disabled Accessibility Regulations and HUD funding requirements for accessibility. The project proposes ground-floor residential units that will also meet local, state, federal</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		and HUD requirements for accessibility. Source Documentation: (5) (6) (45) (46) (47) (48)	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	There are no unique natural features or water resources on the site itself. Petaluma Creek is adjacent to the site, but will not be affected by project activities (rehabilitation). Source Documentation: (5)	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	3	The site does not support sensitive habitats associated with special status plant or wildlife species. The site does not support wetland or riparian habitats. A vacant parcel lies between the area of rehabilitation and the Petaluma River. The existing trees and other vegetation on the site provide habitat for common birds and other urban-adapted wildlife species, but their removal or trimming would not eliminate any of these species from the vicinity. Nesting birds may occur on the ground or in trees, shrubs, open areas, buildings, or other locations within and adjacent to the project site. Nests of all native bird species are protected under the federal Migratory Bird Treaty Act (MBTA) and Section 3503 the California Fish and Game Code, which prohibits the take, possession, or destruction of nests or eggs. If vegetation removal or construction activities were scheduled during the nesting season (typically defined by CDFW as February through August). No tree trimming or removal is planned; however, landscaping may be included in project activities.	VW1. Where outdoor work has the potential to disturb nesting birds, a qualified biologist shall inspect vegetation for active nests within seven (7) days of the start of work to confirm that no active nests would be impacted.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Therefore, it is recommended that a qualified biologist inspect the vegetation for active nests within seven (7) days of the start of work to confirm that no active nests would be impacted, where outdoor work has the potential to disturb nesting birds. Mitigations for the protection of nesting and migratory birds are required. Mitigations Required: VW1 Source Documentation: (5) (9) (14) (31)	
Other Factors 1	1	The project will provide affordable housing units for low-income individuals and families. The project will provide a safe, clean, and sanitary place for residents in a location convenient to public transportation, commercial facilities, services, recreational and cultural opportunities. The proposed project is beneficial to both residents and the community. The project site does not present any adverse effects to environmental justice populations. There is a benefit in this regard. Source Documentation: (5)	
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	1	The principal greenhouse gases that contribute to global warming and climate change include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), as well as black carbon and fluorinated gases (F-gases): hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulfur hexafluoride (SF6). After increasing rapidly in past decades, greenhouse gas (GHG) emissions throughout California and the Bay Area have leveled off. However, in order to	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>prevent the most dangerous climate change scenarios, we must reduce GHG emissions greatly. It is especially important to rapidly reduce emissions of those GHGs with very high global warming potential, such as methane, black carbon, and F-gases, referred to as "super-GHGs". The California Air Resources Board refers to these compounds as short-lived climate pollutants or SLCPs. To provide a roadmap, the Bay Area Air Quality Management District's (BAAQMD's) 2017 Climate Action Plan describes an ambitious strategy to reduce GHG emissions in order to protect the climate. CO₂e is the carbon dioxide equivalent of greenhouse gas emissions taken in their entirety and used to measure impacts of projects, plans, mobile and stationary, permitted sources of emissions. The project is estimated to generate a total of 43.0314 Metric Tons per year of CO₂e (MT CO₂e) operationally. At the project level, the Bay Area Air Quality Management District identifies a Threshold of Significance under the California Environmental Quality Act of 1,100 MT CO₂e of greenhouse gas emissions at the operational level for non-stationary sources, such as this mixed-use/residential project. The greenhouse gas emissions generated by the project are below project-level Thresholds of Significance under CEQA. California has the strictest environmental laws in the Nation. The project is below Thresholds of Significance under CEQA; is therefore consistent with</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		the Climate Action Plan (CAP); and therefore the project does not represent a significant impact to climate change. Source Documentation: (49) (50)	
Energy Efficiency	2	The project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulation as enforced by the City of Petaluma. The project does not represent a wasteful use of energy. The project utilizes unused space and therefore is an efficient use of energy. As the project replaces unused commercial space, there is no impact in this regard. Source Documentation: (5)	

Supporting documentation

- [20221006_14584102702_21_Soil_Report\(1\).pdf](#)
- [SSAs\(1\).JPG](#)
- [Rivers\(1\).pdf](#)
- [Sonoma county census tract map\(1\).pdf](#)
- [Petaluma Census 2020\(1\).pdf](#)
- [ejscreen_report\(1\).pdf](#)

Additional Studies Performed:

See attached list of source documentation.

Field Inspection [Optional]: Date and completed

by:

Cinnamon Crake

10/27/2022 12:00:00 AM

[photo.pdf](#)

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

See attached list of source documentation.

[Source Documentation.pdf](#)

List of Permits Obtained:

None.

Public Outreach [24 CFR 58.43]:

Interested parties list and neighbors are attached.

[Downtown River Apts - Interested parties list.docx](#)
[exp_15Dec22_142751.rtf](#)

Cumulative Impact Analysis [24 CFR 58.32]:

No adverse cumulative impact were identified as a result of the project. The increase in housing and population have been analyzed, accounted for and mitigated for in both local plans (Central Petaluma Specific Plan) and regional plans (Plan Bay Area 2050). There are no City of Petaluma planned projects in the near future that could cause significant adverse impacts to the project site.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Alternatives include the No Action alternative below.

No Action Alternative [24 CFR 58.40(e)]

No change to the site would occur. The impacts discussed in the Environmental Assessment would not occur under this alternative. The site would continue to contain unleased commercial space. Additional affordable housing units would not be created within an existing building envelope. The no action alternative would not achieve any of the stated goals of the developer, property owner, City of Petaluma or regional plans for affordable housing.

Summary of Findings and Conclusions:

The project is suitable from an environmental standpoint. As long as the mitigation measures are adhered to, there is no anticipated significant impact from the project. The project will provide a safe, sanitary, and affordable place for residents.

Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Noise Abatement and Control	N1.tFor new residential units that face East Washington Street and will have the existing commercial space windows replaced, the applicant shall replace windows with sound rated assemblies that achieve STC 27 or better.	N/A		
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	VW1. Where outdoor work has the potential to disturb nesting birds, a qualified biologist shall inspect vegetation for active nests within seven (7) days of the start of work to confirm that no active nests would be impacted.	N/A		

Project Mitigation Plan

See attached MMRP.

[MMRP.docx](#)

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. Source Documentation: (5) (6) (7)

Supporting documentation

[Petaluma-Airport-Safety-Zones.pdf](#)
[Airports.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. The majority of the site is located in the 500-year floodplain. The project does not constitute a Critical Action. No mitigation is needed. The 8-Step Process is not invoked. Source Documentation: (9)

Supporting documentation

[current flood insurance policy.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes

No

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. The Bay Area Air Quality Management District (BAAQMD) is in attainment for all National Air Quality Standards except for Ozone and Particulate Matter (PM10 and PM2.5). The project is the rehabilitation of an existing building. Rehabilitation does not require additional compliance with the Clean Air Act (CAA) because no development is created that would contribute to air pollution (40 CFR s. 93.153[c] [2])). This project does not require further review for compliance with federal air quality standards. Exposure of Residents to Toxic Air Contaminants (TACs) There are no freeways or arterial roadways within 1,000 feet to analyze for impacts to residents. No mitigation is needed. Source Documentation: (10) (11)

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

Screen Summary

Compliance Determination

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. The project is rehabilitation of the interior of an existing building. There is a Local Coastal Program for western Sonoma County that lies along the California coastline. The site is located over 18 miles from the coast. A Coastal Development Permit is not required. Source Documentation: (12)

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

Yes, the activities involved in the project have the potential to affect species and/or habitats.

Screen Summary

Compliance Determination

Supporting documentation

[Species List Sacramento Fish And Wildlife Office.pdf](#)

Are formal compliance steps or mitigation required?

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

Yes

Screen Summary

Compliance Determination

Supporting documentation

[7140787_2\(1\).pdf](#)

[ASD - 2\(1\).pdf](#)

[Explosive-and-Flammable-Facilities-Worksheet.pdf](#)

[ASD - 3.pdf](#)

[ASD - 10.pdf](#)

[ASD - 12.pdf](#)

[ASD - 13.pdf](#)

[ASD - 5.pdf](#)

[ASD - 6.pdf](#)

[ASD - 7.pdf](#)

[ASD - 16.pdf](#)

[ASD - 19.pdf](#)

[ASD - 22.pdf](#)

[Table 1 ASTs within one mile of the Subject Property.pdf](#)

[Proposed Major Development Projects In The City Of Petaluma.pdf](#)

Are formal compliance steps or mitigation required?

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

No

Screen Summary

Compliance Determination

Supporting documentation

[20221006_14584102702_21_Soil_Report.pdf](#)

Are formal compliance steps or mitigation required?

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)
- None of the above

Screen Summary

Compliance Determination

Supporting documentation

[FIRMETTE_b2dbb5b5-425d-4a7a-a534-5ce139ca4036\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

New construction for residential use

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
None of the above

Screen Summary

Compliance Determination

Supporting documentation

[SMART_Schedule_Oct3.pdf](#)
[projected traffic.pdf](#)

[DNL Calculator - HUD Exchange - Future Noise Environment.pdf](#)

[DNL Calculator - HUD Exchange - Existing Noise Environment.pdf](#)

[Airport\(1\).pdf](#)

Downtown-River-
Apartments

Petaluma, CA

900000010289247

Are formal compliance steps or mitigation required?

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

No

Screen Summary

Compliance Determination

Supporting documentation

[SSAs.JPG](#)

Are formal compliance steps or mitigation required?

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

No

Yes

Screen Summary

Compliance Determination

Supporting documentation

[ags_957e7f17beda4106a14dc6b33e2772fa.pdf](#)

Are formal compliance steps or mitigation required?

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

Supporting documentation

[Rivers.pdf](#)

Are formal compliance steps or mitigation required?

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

Yes

No

Screen Summary

Compliance Determination

Supporting documentation

[Petaluma Census 2020.pdf](#)

[Sonoma county census tract map.pdf](#)

[ejscreen_report.pdf](#)

Are formal compliance steps or mitigation required?