

## SECTION 4: CUMULATIVE EFFECTS

### 4.1 - Introduction

CEQA Guidelines Section 15130 requires the consideration of cumulative impacts within an EIR when a project’s incremental effects are cumulatively considerable. Cumulatively considerable means that “. . . the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” In identifying projects that may contribute to cumulative impacts, the CEQA Guidelines allow the use of a list of past, present, and reasonably anticipated future projects, producing related or cumulative impacts, including those which are outside of the control of the lead agency.

In accordance with CEQA Guidelines Section 15130(b), “. . . the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, the discussion need not provide as great [a level of] detail as is provided for the effects attributable to the project alone.” The discussion should be guided by standards of practicality and reasonableness, and it should focus on the cumulative impact to which the identified other projects contribute rather than on the attributes of other projects that do not contribute to the cumulative impact.

The proposed 2040 General Plan’s cumulative impacts were considered in conjunction with the One Bay Area 2040 Projections for Marin County. This geographical area was selected because the Planning Area is wholly contained in Marin County. Table 4-1 provides a summary of projections.

**Table 4-1: Marin County 2040 Projections**

Jurisdiction	Employment	Population	Households	Dwelling Units
Marin County	129,000	285,000	112,000	119,000

Source: Association of Bay Area Governments, Metropolitan Transportation Commission, 2013.

### 4.2 - Cumulative Impact Analysis

The cumulative impact analysis below is guided by the requirements of CEQA Guidelines Section 15130. Key principles established by this section include:

- A cumulative impact only occurs from impacts caused by the proposed project and other projects. An EIR should not discuss impacts that do not result from the proposed project.
- When the combined cumulative impact from the increment associated with the proposed project and other projects is not significant, an EIR need only briefly explain why the impact is not significant; detailed explanation is not required.
- An EIR may determine that a project’s contribution to a cumulative effect impact would be rendered less than cumulatively considerable if a project is required to implement or fund its fair share of mitigation intended to alleviate the cumulative impact.

- The cumulative impact analysis that follows relies on these principles as the basis for determining the significance of the proposed 2040 General Plan’s cumulative contribution to various impacts.

## 4.3 - Cumulative Impact Analysis

### 4.3.1 - Aesthetics, Light, and Glare

The geographic scope of the cumulative aesthetics, light, and glare analysis is the Planning Area and nearby areas within view of the Planning Area. These areas are within view of the project and, therefore, are most likely to experience changes in visual character or experience light and glare impacts.

Development and land use activities within both the Planning Area and nearby areas have the potential to result in changes to scenic vistas and visual character. Both the 2040 General Plan and other planning documents (Zoning Ordinance, Design Guidelines, etc.) establish policies to guide future development and land use activities in a manner that protects significant visual resources, ensures land use compatibility, and facilitates well-designed projects. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable aesthetic impacts.

Development and land use activities within both the Planning Area and nearby areas also have the potential to introduce new sources of light and glare. Both the 2040 General Plan and other long-term planning documents establish policies to promote appropriate urban growth, reduce energy usage (e.g., lighting), and ensure land use compatibility, which collectively would serve to minimize adverse impacts associated with light and glare. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable light and glare impacts.

### 4.3.2 - Air Quality and Greenhouse Gas Emissions

The geographic scope of the cumulative air quality analysis is the San Francisco Bay Area Air Basin. Air pollution is regarded as a regional issue; therefore, this area would be the area most likely to be impacted by project emissions.

Development and land use activities within the Planning Area and Marin County would result air emissions from construction and operational activities. Air emissions are regulated at the regional level by the Bay Area Air Quality Management District, which uses ABAG population and employment projections as the basis for its air quality management planning. Growth in various jurisdictions within the Air Basin may or may not be within projected levels. Growth contemplated by the 2040 General Plan would be within ABAG population and employment projections for the City of Mill Valley; therefore, no conflicts would occur with regional clean air planning assumptions. Additionally, the 2040 General Plan would not alter existing land use designations within Mill Valley and, therefore, would not increase exposure to toxic air contaminants or objectionable odors beyond existing levels. Finally, the 2040 General Plan contains a Climate Action Element, which serves as

Mill Valley's Climate Action Plan, and seeks to reduce greenhouse gas emissions to within adopted targets. As such, the 2040 General Plan would not have a cumulatively considerable contribution to air quality or greenhouse gas emissions impacts.

### 4.3.3 - Biological Resources

The geographic scope of the cumulative agricultural resources analysis is the Planning Area and areas within 2 miles of the Planning Area. Generally, biological resource impacts tend to be localized; therefore, a 2-mile buffer around the Planning Area provides for a conservative evaluation of cumulative impacts.

Development and land use activities within both the Planning Area and nearby areas have the potential to result in impacts to special-status plant and animal species, sensitive natural habitat, federally protected wetlands, and wildlife movement. The 2040 General Plan, other long-term planning documents, and regulatory agency guidance establish policies that require mitigation for impacts on potential biological resources (e.g., focused surveys and resource replacement ratios). Furthermore, these documents generally emphasize permanently protecting high-value biological resources as open space and restoration of degraded areas. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable biological resource impacts.

### 4.3.4 - Cultural Resources

The geographic scope of the cumulative cultural resources analysis is the Planning Area and areas within 1 mile of the Planning Area. Generally, cultural resource impacts tend to be localized; therefore, a 1-mile buffer around the Planning Area provides for a conservative evaluation of cumulative impacts.

Development and land use activities within both the Planning Area and nearby areas have the potential to result in impacts to documented and undiscovered cultural resources such as artifacts, fossils, and burial sites. The 2040 General Plan, other long-term planning documents, and regulatory agency guidance establish policies that require mitigation for impacts on potential cultural resources (e.g., evaluation requirements and inadvertent discovery procedures). Additionally, the 2040 General Plan calls for preserving and protecting potential and listed historic and archaeological resources, working with the Mill Valley Historical Society to develop a comprehensive inventory of potential historic and archaeological resources, protecting the value of historic and cultural resources, and promoting education about historic preservation. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable cultural resource impacts.

### 4.3.5 - Geology, Soils, and Seismicity

The geographic scope of the cumulative geology, soils, and seismicity analysis is the Planning Area and areas within 1 mile of the Planning Area. Generally, geologic, soil, and seismic impacts tend to be localized; therefore, a 1-mile buffer around the Planning Area provides for a conservative evaluation of cumulative impacts.

Development and land use activities within both the Planning Area and nearby areas have the potential to result in impacts to seismic hazards (e.g., fault rupture, ground shaking, liquefaction, landsliding), erosion, unstable soils and geologic units, and expansive soils. The 2040 General Plan, other long-term planning documents, and regulatory agency guidance establish policies that call for emergency preparedness, identification of seismic hazards, and measures to reduce injury and damage from seismic hazards. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable geologic, soil, and seismic impacts.

#### **4.3.6 - Hazards and Hazardous Materials**

The geographic scope of the cumulative hazards and hazardous materials analysis is the Planning Area and areas within 2 miles of the Planning Area. Generally, hazards impacts tend to be localized; therefore, a 2-mile buffer around the Planning Area provides for a conservative evaluation of cumulative impacts.

Development and land use activities within both the Planning Area and nearby areas have the potential to result in impacts associated with hazardous materials usage, risk of upset, exposure of schools, emergency evacuation, and wildfires. The 2040 General Plan, other long-term planning documents, and regulatory agency guidance establish policies that require compliance with hazardous materials handling regulations, inspection and reporting requirements, first responder training, identification of evacuation and response procedures, and wildfire protection measures. Furthermore, the 2040 General Plan sets for goals and policies that call for emergency preparedness, identification of potential hazards, maintaining adequate emergency response capabilities, ensuring that critical infrastructure is available during response to emergencies, planning for disasters, maintaining emergency response and evacuation routes, and implementing measures to reduce injury and damage from hazards. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable hazard and hazardous material impacts.

#### **4.3.7 - Hydrology and Water Quality**

The geographic scope of the cumulative hydrology and water quality analysis consists of the Richardson Bay watershed, which is tributary to the Planning Area. Hydrologic and water quality issues have the potential to affect downstream areas; therefore, using the Planning Area watershed provides for a conservative evaluation of cumulative impacts.

Development and land use activities within both watersheds have the potential to create adverse impacts associated with water quality, groundwater, flooding, and drainage. The 2040 General Plan, other long-term planning documents, and regulatory agency guidance establish policies that call for improving water quality, and increasing the use of pervious paving, rainwater storage, and greywater systems to improve water quality. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable hydrologic and water quality impacts.

### 4.3.8 - Land Use

The geographic scope of the cumulative land use analysis is the Planning Area and jurisdictions that border the Planning Area. Land use decisions are made at the jurisdictional level; therefore, using jurisdictions is an appropriate geographic scope.

Development and land use activities within the Planning Area and neighboring jurisdictions have the potential to create adverse impacts associated with division of an established community and inconsistency with adopted land use plans. The 2040 General Plan, other long-term planning documents, and regulatory agency guidance establish policies that require the evaluation of land use compatibility and compliance with applicable requirements. It should be noted that development and land use activities are required to be consistent with the General Plan and Zoning Ordinance. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable land use impacts.

### 4.3.9 - Noise

The geographic scope of the cumulative noise analysis is the project vicinity, including surrounding sensitive receptors. Noise impacts tend to be localized; therefore, the area near the project site would be the area most affected by project activities.

Development and land use activities within the Planning Area and neighboring jurisdictions have the potential to create adverse impacts associated with noise level increases that expose receptors to unacceptable ambient noise levels. As discussed in Section 3.9, Noise, the upper limit for “normally acceptable” exterior noise levels at single-family residential uses is 60 dBA  $L_{dn}$  and the upper limit for “conditionally acceptable” exterior noise levels are 75 dBA  $L_{dn}$ . Roadway noise contours associated with every major arterial roadways are currently at or exceed 60 dBA  $L_{dn}$ . Roadway noise is a function of the high traffic volumes experienced along roadways such as E. Blithedale Avenue (36,000 daily trips), Camino Alto (22,300 daily trips), and Miller Avenue (26,000 daily trips) under existing conditions. Because of the land use and circulation patterns within Mill Valley, there is no feasible way to lower traffic volumes on these roadways such that “normally acceptable” exterior noise level standard of 60 dBA  $L_{dn}$  can be achieved.

In recognition of this, 2040 General Plan Policy N-1 establishes that residential development sites exposed to noise levels exceeding 60  $L_{dn}$  shall be analyzed, following protocols in the most recent adopted version of the California Building Code. Policy N-1 also establishes an interior noise limit of 45  $L_{dn}$ , which provides an unequivocal performance standard that must be met by all new residential projects. This latter requirement reflects that building materials and techniques (concrete, insulation, sound-rated door and window assemblies, etc.) can yield noise attenuation rates of 25 dB or more between exterior and interior noise levels and, thus, provides a very effective method of reducing noise in environments with high ambient noise levels. However, noise levels would exceed “normally acceptable” exterior noise level standard of 60 dBA  $L_{dn}$  and, there is no feasible mitigation to reduce exterior noise levels to acceptable levels. As such, development and land use activities contemplated by the 2040 General Plan would contribute to cumulatively significant noise impacts.

### 4.3.10 - Public Services, Recreation, and Utilities

The geographic scope of the cumulative public services and recreation analysis is the Planning Area and the service areas of the public service providers that serve the Planning Area: Mill Valley Fire Department, Southern Marin Emergency Medical Paramedic System, Mill Valley Police Department, Mill Valley Elementary School District, Tamalpais Union High School District, Marin Municipal Water District, Sewerage Agency of Southern Marin, Marin County Flood Control and Water Conservation District (Zone 3), Mill Valley Refuse Service, Marin Energy Authority, and Pacific Gas and Electric Company.

Development and land use activities within the Planning Area and neighboring jurisdictions have the potential to increase demands for public services including fire protection, emergency medical response, police protection, schools, parks, libraries, and recreational facilities. The 2040 General Plan, other long-term planning documents, and regulatory agency guidance establish policies that identify minimum service levels, require payment of development fees and installation of necessary facilities, and set forth mechanisms to ensure the continued maintenance of services and facilities. Collectively, these measures would ensure that public services and facilities provide adequate service delivery for existing and future development and land use activities. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable public service and recreation impacts.

Development and land use activities within the Planning Area and neighboring jurisdictions have the potential to increase demands for utilities, including water, wastewater, storm drainage, solid waste, and energy. The 2040 General Plan, other long-term planning documents, and regulatory agency guidance establish policies that promote the wise and sustainable use of resources, require the installation of necessary infrastructure, and encourage conservation. Collectively, these measures would ensure that utility systems have adequate capacity to serve existing and future development and land use activities. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable utility system impacts.

### 4.3.11 - Transportation

The geographic scope of the cumulative transportation analysis is the Planning Area and Central and Southern Marin County (Corte Madera, San Rafael, Larkspur, Tiburon, and Sausalito).

Development and land use activities within the Planning Area and neighboring jurisdictions would increase for various modes of transportation. The 2040 General Plan and other long-term planning documents identify necessary transportation improvements and set forth policies that identify mechanisms to implement the improvements. Collectively, these measures would ensure that adequate transportation infrastructure and services are available for existing and future development and land use activities. Therefore, development and land use activities contemplated by the 2040 General Plan and other land use plans would not have cumulatively considerable transportation impacts.