

1. INTRODUCTION

1.1 TYPE AND PURPOSE OF THE EIR

The 270 and 280 Casa Grande Road Creekwood Housing Development Project Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970, Public Resources Code [PRC] Section 21000-21189, as amended, and the Guidelines for Implementation of the California Environmental Quality Act, California Code of Regulations [CCR] Title 14, Section 15000-15387 (CEQA Guidelines). The City of Petaluma is the lead agency for the environmental review of the 270 and 280 Casa Grande Road Creekwood Housing Development Project (proposed project) evaluated herein and has the principal responsibility for approving the project. As required by Section 15121 of the CEQA Guidelines, this EIR will (a) inform public agency decision-makers, and the public generally, of the significant environmental effects of the project, (b) identify possible ways to minimize the significant adverse environmental effects, and (c) describe reasonable and feasible project alternatives which reduce environmental effects. The public agency shall consider the information in the EIR along with other information that may be presented to the agency and must certify the EIR prior to taking action on the project entitlements.

As provided in the CEQA Guidelines Section 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. The public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social issues. CEQA requires the preparation of an EIR prior to approving any project that may have a significant effect on the environment. For the purposes of CEQA, the term project refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). With respect to the proposed project, the City has determined that the proposed development is a *project* within the definition of CEQA, which has the potential for resulting in significant environmental effects based on results of the Initial Study prepared for the proposed project. Accordingly, an EIR has been prepared.

The lead agency is required to consider the information in the EIR along with any other available information prior to deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, environmental impacts, mitigation measures, alternatives, growth-inducing impacts, and cumulative impacts.

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a *project-level EIR* pursuant to CEQA Guidelines Section 15161, which is an analysis that examines the environmental impacts of a specific development project. A *project-level EIR* focuses primarily on the changes in the environment that would result from the development of the project, and examines all phases of the project including planning, construction, and operation. The focus of the EIR, and the topics addressed herein, are described under Section 1.5, Scope of the EIR, of this chapter, below. As discussed in Section 1.5, an Initial Study was prepared by the City early in the CEQA process to focus the content of the EIR on those environmental topics concerning which the proposed project could have a significant impact.



1.2 KNOWN RESPONSIBLE AND TRUSTEE AGENCIES

“Responsible agency” means a public agency that proposes to carry out or approve a project for which a lead agency is preparing or has prepared an EIR or Negative Declaration. For the purpose of CEQA, the term responsible agency includes all California public agencies other than the lead agency that have discretionary approval power over the project or an aspect of the project. The San Francisco Bay Regional Water Quality Control Board (RWQCB) would be considered a responsible agency for the proposed project.

“Trustee agency” means a State agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the State of California. The only known trustee agency for the project is the California Department of Fish and Wildlife (CDFW).

Although not subject to California law and, thus, outside the definitions of responsible agency or trustee agency, the U.S. Army Corps of Engineers (USACE) and U.S. Fish and Wildlife Service (USFWS) may also be called upon to grant approvals — under federal law — necessary for the development of the project site. The above agencies do not have duties under CEQA, but, rather, are governed by a variety of federal statutes, such as the Clean Water Act, which governs the dredging and filling of waters of the U.S. (e.g., wetlands), and the Endangered Species Act, which requires USACE to consult with the USFWS as part of the review process for any wetland or fill permits that may be required.

1.3 PROJECT SUMMARY

This section provides an overview of the project location and components. For additional project description details, please refer to Chapter 3, Project Description, of this EIR.

Project Location and Setting

The project site consists of two parcels totaling approximately 5.2 acres that abut the eastern boundary of Casa Grande Road in the City of Petaluma. The parcels are identified by the following addresses and Assessor’s Parcel Numbers (APNs): 270 Casa Grande Road (APN 017-040-051) and 280 Casa Grande Road (APN 017-040-016). In addition, a City-owned parcel identified by APN 017-410-042 is immediately adjacent to the project site’s eastern boundary. The 280 Casa Grande Road parcel contains an existing residence and undeveloped land covered in grasses. The 270 Casa Grande Road parcel contains an existing residence, several associated outbuildings, a landscaped backyard, and a small orchard in the northeast corner of the project site, within a depressed area, near Adobe Creek (Creek). The Creek and its associated vegetation forms the eastern boundary of the project site. The remaining portions of the 270 Casa Grande Road parcel are generally characterized by grasses that are routinely mowed or grazed to reduce fire hazards. According to the City’s General Plan, the project site is designated Medium Density Residential. The project site is zoned Residential (R4).

The project site is bound to the west by Casa Grande Road and to the east by the Creek and its associated riparian corridor. The project site’s northern boundary abuts the Casa Grande Senior Apartments. A single-family residence is located further to the north. A single-family residential neighborhood is located to the east, across the Creek, with access from Spyglass Road. Further east from the single-family residences is a multifamily neighborhood, to which Lakeville Circle provides access. The project site’s southern boundary abuts the recently completed Casa Grande Subdivision. An existing single-family residential neighborhood is located further to the south and abuts the southern property line of the Casa Grande Subdivision site (now referred to as Makenna). Casa Grande High School and Crinella Park are located to the west, across Casa



Grande Road, from the project site. It should be noted that Sonoma Mountain High School, an alternative high school in the City, is also located on the Casa Grande High School campus.

Project Components

The proposed project would include demolition of the on-site residence at 280 Casa Grande Road, retention of the existing residence at 270 Casa Grande Road, and development of 59 dwelling units. The proposed dwelling units would be constructed across three blocks. Block 1 units would be arranged in tri-plex configurations. Units within Blocks 2 and 3 would primarily be arranged in duet unit configurations. Each dwelling unit would include Usable Open Space (UOS) in the form of semi-private or private yard areas. In addition, the project would include construction of various on-site road and utility improvements, landscaping, and a new off-site public multi-use pathway, with a bridge connection over the Creek.

The project would require City approval of a Vesting Tentative Parcel Map, Site Plan and Architectural Review, and a Tree Removal Permit. In addition, the project would require other approvals from responsible and trustee agencies, including, but not necessarily limited to, CDFW approval of a 1600 Lake and Streambed Alteration Agreement and RWQCB approval of a NPDES Construction General Permit.

A fully detailed project description is provided in Chapter 3, Project Description, of this EIR.

1.4 EIR PROCESS

The EIR process begins with the decision by the lead agency to prepare an EIR, either during a preliminary review of a project or at the conclusion of an Initial Study. Once the decision is made to prepare an EIR, the lead agency sends a Notice of Preparation (NOP) to appropriate government agencies and, when required, to the State Clearinghouse (SCH) in the Office of Planning and Research (OPR), which will ensure that responsible and trustee State agencies reply within the required time. The SCH assigns an identification number to the project, which then becomes the identification number for all subsequent environmental documents on the project. Commenting agencies have 30 days to respond to the NOP and provide information regarding alternatives and mitigation measures they wish to have explored in the Draft EIR and to provide notification regarding whether the agency will be a responsible agency or a trustee agency for the project.

An NOP, as well as a detailed Initial Study (see Appendix A), was prepared for the proposed project and circulated from October 21, 2022 to November 21, 2022. A public scoping meeting was held on November 14, 2022 for the purpose of informing the public and receiving comments on the scope of the environmental analysis to be prepared for the proposed project. See Section 1.6 below for a summary of comments received on the NOP.

As soon as the Draft EIR is completed, a Notice of Completion will be filed with the SCH and a public notice of availability will be published to inform interested parties that a Draft EIR is available for agency and public review. In addition, the notice provides information regarding the location of copies of the Draft EIR available for public review and any public meetings or hearings that are scheduled. The Draft EIR will be circulated for a period of 45 days, during which time reviewers may provide comments. The lead agency must respond to comments in writing, describing the disposition of any significant environmental issues raised and explaining in detail the reasons for not accepting any specific comments concerning major environmental issues. If significant new information, as defined in CEQA Guidelines section 15088.5, is added to an EIR



after public notice of availability is given but before certification of the EIR, the revised EIR or affected chapters must be recirculated for an additional public review period with related comments and responses.

A Final EIR will be prepared, containing comments and responses to comments on the Draft EIR. The Final EIR will also include any changes to the Draft EIR text made as a result of public comment, as warranted. The Final EIR will also include the Mitigation Monitoring and Reporting Program (MMRP) prepared in accordance with PRC Section 21081.6. Before approving a project, the lead agency shall certify that the Final EIR has been completed in compliance with CEQA, and that the Final EIR has been presented to the decision-making body of the lead agency, which has reviewed and considered the EIR. The lead agency shall also certify that the Final EIR reflects the lead agency's independent judgment and analysis.

Pursuant to CCR Title 14, Section 15091, a public agency shall not approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The findings prepared by the lead agency must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. If the decision-making body elects to proceed with a project that would have unavoidable significant impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must be prepared.

1.5 SCOPE OF THE EIR

This EIR constitutes a project-level analysis for the proposed project and, pursuant to CEQA Guidelines Section 15161, covers “all phases of the project including planning, construction, and operation.” State CEQA Guidelines § 15126.2(a) states, in pertinent part:

An EIR shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced.

Pursuant to the CEQA Guidelines, the scope of this EIR addresses specific issues and concerns identified as potentially significant in the Initial Study prepared for the proposed project. Environmental issues dismissed in the Initial Study are discussed in Chapter 4, Introduction to the Analysis, of this EIR.

Environmental Issues Addressed in this EIR

The sections of the CEQA Guidelines Appendix G Checklist identified for study in this EIR include the following:

- Biological Resources;
- Greenhouse Gas Emissions;
- Hydrology and Water Quality; and
- Transportation.



The evaluation of effects is presented on a resource-by-resource basis in Chapters 4.1 through 4.4 of the EIR. Each chapter is divided into the following four sections: Introduction, Existing Environmental Setting, Regulatory Context, and Impacts and Mitigation Measures. Impacts that are determined to be significant in Chapters 4.1 through 4.4, and for which feasible mitigation measures are not available to reduce those impacts to a less-than-significant level, are identified as *significant and unavoidable*. Chapter 5 presents a discussion of growth-inducing impacts, a summary of cumulative impacts, and significant irreversible as well as significant unavoidable environmental changes associated with the project. Alternatives to the proposed project are discussed in Chapter 6 of this EIR.

1.6 COMMENTS RECEIVED ON THE NOTICE OF PREPARATION

During the NOP public review period from October 21, 2022 to November 21, 2022, the City of Petaluma received 11 comment letters (including two comment letters from Rick Parker). Four verbal comments were received at the public scoping meeting held on November 14, 2022. A copy of each letter submitted is provided in Appendix B to this EIR. The letters regarding the NOP were received from the following public agencies and individuals:

Public Agencies

- Department of Fish and Wildlife – Erin Chappell;
- Native American Heritage Commission —Cameron Vela; and
- National Oceanic and Atmospheric Administration – Jodi Charrier.

Individuals

- Carol Crabill;
- Steven J. Lafranchi;
- Joe Lampe;
- Caroline McFarland;
- Rick Parker;
- Jason and Teresa Shern; and
- Gordon Wong.

The following list, categorized by issue, summarizes the concerns brought forth in the comment letters and verbal comments received on the scope of the EIR:

<p><u>Biological Resources</u> (Chapter 4.1)</p>	<p>Concerns related to:</p> <ul style="list-style-type: none"> • Adverse impact to California Coast Steelhead and designated critical habitat. • Impacts upon Adobe Creek and associated riparian habitat. • Adverse impact to Pacific Salmon and designated critical habitat. • Impacts upon migratory birds protected under the federal Migratory Bird Treaty Act. • Impacts upon protected habitats as well as special-status plant and wildlife species.
<p><u>Hydrology and Water Quality</u> (Chapter 4.3)</p>	<p>Concerns related to:</p> <ul style="list-style-type: none"> • Increased potential for flooding. • Inaccurate description of the proposed CLOMR boundaries.
<p><u>Transportation</u> (Chapter 4.4)</p>	<p>Concerns related to:</p> <ul style="list-style-type: none"> • Increase in traffic volume. • Insufficient quality of Ely Boulevard in the project vicinity.



	<ul style="list-style-type: none"> • Adverse impacts upon emergency evacuation. • Increase in Vehicle Miles Traveled (VMT). • Lack of sidewalks in the vicinity of the proposed project can lead to safety concerns. • Access to transit connections, types of transit connections, and connection between project site and nearby activity centers.
<p>Initial Study (Appendix A)</p>	<p>Concerns related to:</p> <ul style="list-style-type: none"> • Aesthetic impacts of building the proposed bridge across Adobe Creek. • Increased traffic noise. • Increased pedestrian noise along the proposed bridge across Adobe Creek. • Inadvertently discovered Native American cultural items and/or human remains. • Inconsistency with City goals to develop housing in central Petaluma.

Concerns related to biological resources, greenhouse gas emissions, hydrology and water quality, and transportation are addressed in this EIR. All other issues are discussed in the Initial Study (see Appendix A) prepared for the proposed project.

1.7 DRAFT EIR AND PUBLIC REVIEW

This Draft EIR is being circulated for public review and comment for a period of 45 days. During this period, the general public, organizations, and agencies can submit comments to the Lead Agency on the Draft EIR's accuracy and completeness. Release of the Draft EIR marks the beginning of a 45-day public review period pursuant to CEQA Guidelines Section 15105. The public can review the Draft EIR at the City's website at:

<https://cityofpetaluma.org/planning-major-developments/>

All comments or questions regarding the Draft EIR should be addressed to:

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11 English Street
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1.8 ORGANIZATION OF THE DRAFT EIR

The EIR is organized into the following sections:

Chapter 1 – Introduction

Provides an introduction and overview describing the intended use of the Draft EIR and the review and certification process, as well as summaries of the chapters included in the Draft EIR and summaries of the issues and concerns received from the public and public agencies during the NOP review period.



Chapter 2 – Executive Summary

Summarizes the elements of the project, project alternatives, and the environmental impacts that would result from implementation of the proposed project, describes proposed mitigation measures, and indicates the level of significance of impacts after mitigation.

Chapter 3 – Project Description

Provides a detailed description of the proposed project, including the project's location, background information, objectives, and technical characteristics.

Chapter 4.0 – Environmental Setting, Impacts, and Mitigation

Contains a project-level and cumulative analysis of environmental issue areas associated with the proposed project. The section for each environmental issue contains an introduction and description of the setting of the project site as well as an overview of regulatory context, identifies impacts, and recommends appropriate mitigation measures.

Chapter 4.1 – Biological Resources

The Biological Resources chapter of the EIR will summarize the setting and describe the potential project effects on rare, endangered, candidate, sensitive, and other special-status species that may inhabit the project site. This chapter of the EIR will also evaluate the project's potential effects on sensitive habitats, including but not necessarily limited to riparian habitat and State or federally protected wetlands. Effects associated with all on-site and off-site improvements will be included in the analysis. Analysis in the chapter will be based on a Biological Resources Assessment prepared specifically for the project. Mitigation measures for all identified impacts will be developed consistent with applicable laws and regulations.

Chapter 4.2 – Greenhouse Gas Emissions

The Greenhouse Gas (GHG) Emissions chapter of the EIR will include a discussion of the existing regulatory setting and context related to GHG Emissions, including Assembly Bill (AB) 32 and Senate Bill (SB) 32, and an impacts and mitigation section with quantitative data showing the project's contribution to the generation of GHG emissions during the construction and operational phases of the project, as well as a qualitative discussion of project consistency with the design features required by BAAQMD. Feasible and appropriate mitigation measures to avoid or reduce adverse impacts will be identified, as needed.

Chapter 4.3 – Hydrology and Water Quality

The Hydrology and Water Quality chapter of the EIR will summarize setting information and identify potential impacts on stormwater drainage, flooding, and water quality, including stormwater runoff water quality. The Hydrology and Water Quality chapter will evaluate project-related increases in impervious surfaces and stormwater flows, increases in downstream flooding, and on-site facilities necessary to treat and detain on-site runoff. In addition, the chapter will evaluate impacts associated with alteration of the existing drainage patterns. The chapter will primarily be based on a project-specific Hydrology Analysis, Preliminary Drainage Report, and Storm Water Quality Report.

Chapter 4.4 – Transportation

The Transportation chapter of the EIR will be based on a Transportation Impact Study prepared specifically for the project. Impact determination for CEQA purposes will be based on VMT, consistent with CEQA Guidelines Section 15064.3, which became effective statewide on July 1, 2020. The EIR chapter will also include an analysis of the project's potential to conflict with



applicable programs, policies, and ordinances addressing the circulation system, vehicle safety hazards, and emergency access. Feasible and appropriate mitigation measures to avoid or reduce adverse impacts will be identified, as needed.

Chapter 5 – Statutorily Required Sections

The Statutorily Required Sections chapter of the EIR provides discussions required by CEQA regarding impacts that would result from the proposed project, including a summary of cumulative impacts, potential growth-inducing impacts, significant and unavoidable impacts, and significant irreversible changes to the environment.

Chapter 6 – Alternatives Analysis

The Alternatives Analysis chapter of the EIR describes and evaluates the alternatives to the proposed project. It should be noted that the alternatives will be analyzed at a level of detail less than that of the proposed project; however, the analyses will include sufficient detail to allow for a meaningful comparison of impacts.

Chapter 7 – EIR Authors and Persons Consulted

The EIR Authors and Persons Consulted chapter of the EIR lists EIR and technical report authors who provided technical assistance in the preparation and review of the EIR.

Chapter 8 – References

The References chapter of the EIR provides bibliographic information for all references and resources cited.

Appendices

The Appendices include the NOP and Initial Study, comments received during the NOP comment period, and all technical reports prepared for the proposed project.

