

City of Petaluma
General Plan 2025
Final Environmental Impact Report
Volume 6 A, Technical Appendix G-2
Responses to Comments



City of Petaluma
Department of General Plan
Administration

State Clearinghouse
#2004082065

February 14, 2008 

PETALUMA GENERAL PLAN 2025
 FINAL ENVIRONMENTAL IMPACT REPORT
 FEBRUARY 14, 2008
 VOLUME 6.A

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1. INTRODUCTION

RELATIONSHIP BETWEEN DRAFT EIR AND FINAL EIR

In conformance with the California Environmental Quality Act (CEQA) (2007) Section 15132 [Contents of Final Environmental Impact Report], the Final Environmental Impact Report (FEIR) for the proposed **General Plan 2025** (the Plan) consists of five volumes:

- (1) The Draft Environmental Impact Report, distributed for public review and comment on September 12, 2006 [identified as [Volume 5, Technical Appendix G.];
- (2) The Revised Draft EIR, distributed for public review and comment on November 20, 2007 [Volume 5.A: Greenhouse Gas Emissions, Technical Appendix G.1];
- (3) Responses to Comments, published February 15, 2008, plus revisions made to the Draft EIR and Revised Draft EIR, incorporated by reference and identified above, in response to comments received during the two public review periods [Volume 6.A, Technical Appendix G.2].
- (4) Public Comments on Draft EIR and Revised Draft EIR [Volume 6.B, Technical Appendix G.3]; and
- (5) Public Comments on Draft EIR and Revised Draft EIR [continued] [Volume 6.C, Technical Appendix G.4].

None of the revisions to the Draft EIR or Revised Draft EIR result in a new or substantially more severe significant environmental impact arising from the project or from newly identified mitigation measures proposed for implementation. There are no new feasible project alternatives or mitigation measures identified which would clearly lessen the environmental impacts of the General Plan but which have been rejected. New information added to the Draft EIR or Revised Draft EIR is not considered “significant” unless the documents are changed in a way that deprives the public of a meaningful opportunity to comment on a substantial environmental effect of the General Plan or a feasible way to mitigate such an effect that the City has declined to implement.

PROPOSED PROJECT

The proposed project is the adoption of the **General Plan 2025**, which has been identified as serving the following purposes (quoted from the General Plan 2025 document, Introduction):

- Its adoption, by the City Council, reflects a commitment on the part of City Council and their appointed representatives and staff to carry out the Plan.
- Outlines a vision for Petaluma’s long-range physical and economic development and resource conservation; enhances the true quality of life for all citizens; recognizes that all human activity takes place within the limits of the natural environment; and reflects the aspirations of the community;

- Provides strategies and specific implementing policies and programs that will allow this vision to be accomplished;
- Establishes a basis for judging whether specific development proposals and public projects are in harmony with Plan policies and standards;
- Allows City departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve and enhance critical environmental resources, and minimize impacts and hazards; and
- Provides the basis for establishing and setting priorities for detailed plans and implementing programs, such as the Development Codes, the Capital Improvement Program (CIP), facilities and master plans, and redevelopment projects.

Petaluma is located in southwestern Sonoma County. Petaluma's boundaries are defined by the surrounding landscape—the city originated along the banks of the Petaluma River, then spread outward over the floor of the Petaluma River Valley. The Valley itself is defined by Sonoma Mountain on the northeast and by the hills extending northward from Burdell Mountain on the west. To the south are the Petaluma Marshlands and beyond, the San Francisco Bay.

The Planning Referral Area—unchanged from the 1987 General Plan—covers the 113 square-mile Petaluma River watershed within Sonoma County. The 20-year (1998-2018) Urban Growth Boundary (UGB), the Sphere of Influence, and the city's municipal boundary are all contained within the Planning Referral Area. For the purpose of the EIR, it is assumed that development of the General Plan 2025 will occur within the boundaries of the UGB.

This very brief summary of the proposed CEQA defined project should not be relied upon for a thorough understanding of the Plan. Please refer to the Introduction chapter of the General Plan 2025 for a more complete description, key issues, guiding principles, and the planning process undertaken toward completion and adoption of the Plan.

CERTIFICATION PROCESS

Following completion of the Draft EIR, the Lead Agency (the City) directed the preparation of a Revised Draft EIR to address the issue of Greenhouse Gas Emissions. The Revised Draft EIR was prepared and circulated. Comments and responses to comments on the both the Draft EIR and the Revised DEIR are contained within this Final EIR document.

After completion of a Draft EIR, the Lead Agency (the City) is required to prepare a Final EIR pursuant to and in compliance with 14 California Code of Regulations ("CEQA Guidelines") Sections 15088 [Evaluation of and Response to Comments], 15089 [Preparation of Final EIR], and 15132 [Contents of Final Environmental Impact Report]. Certification of this Final EIR by the Petaluma City Council shall occur prior to Council adoption of the proposed **General Plan 2025**.

2. RESPONSES TO COMMENTS ON THE DRAFT EIR AND REVISED DRAFT EIR

After completion of a Draft EIR, the Lead Agency (the City) is required to prepare a Final EIR pursuant, and in compliance with, CEQA Guidelines Sections 15088 [Evaluation of and Response to Comments], 15089 [Preparation of Final EIR], and 15132 [Contents of Final Environmental Impact Report]. This work effort includes the preparation of responses in writing to substantive environmental points raised in the review of the Draft EIR and public review and agency consultation process.

The Draft EIR was distributed in September 2006 for public review and comment. The required 45-day review period on the Draft EIR began on September 12, 2006 and was extended through the public hearing process to conclude on May 21, 2007. Numerous public hearings were held by the Planning Commission and City Council. The Revised Draft EIR was distributed in November 2007; with a 45-day review period beginning on November 20, 2007 and extending to January 7, 2008. Comments received on the Draft EIR and Revised Draft EIR are contained in the two volumes identified as Appendix G, Volumes 6.B and 6.C.

This Response to Comments section includes the following subsections:

- An index of comments received during the public review process for the Draft EIR and Revised Draft EIR. The index includes a comment reference number, the hearing date for a verbal comment or the date received for a written comment; the comment provider; the general comment topic; the form of correspondence (verbal, letter, or email); reference to the FEIR Volume and page letter or number (either 6.B or 6.C.); and the reference to the FEIR Response (Volume 6.A) page number.
- Responses to Comments in numerical order, including reference to Draft EIR or Revised Draft EIR page number modified by response, if applicable; a brief summary of comment; and complete written response.

Note: Please refer to the full set of Comments on the Draft EIR and the Revised Draft EIR (Volumes 6.B and 6.C) for the complete comment; comment summary contained herein is intended for general information and index purposes only.

3. REVISIONS TO THE DRAFT EIR AND REVISED DRAFT EIR

The Final EIR includes revisions to the Draft EIR and Revised Draft EIR documents identified during the preparation of responses to the comments received; they are identified by a ✓ below a response that required a DEIR or RDEIR revision. Revised Table ES-5 (see attached) summarizes the revisions and/or additions/deletions to individual goals, policies and programs identified through the environmental review process. Text revisions are either provided within this Final EIR narrative or are attached hereto and identified using an underline of the revised sentence, Table, or Section. Revised Figures are also attached (see list referenced below). All of the revised text and/or pages supersede the corresponding text and/or pages in the September 2006 Draft EIR and November 2007 Revised Draft EIR. None of these revisions to the Draft EIR and/or Revised Draft EIR involves a new or substantially more severe significant environmental impact arising from the project or from newly identified mitigation measures proposed for implementation. There are no new feasible project alternatives or mitigation measures identified which would clearly lessen the environmental impacts of the General Plan but which have been rejected.

ATTACHMENTS

Revised Table ES-5 of DEIR, listing goals, policies and programs referenced to
Final General Plan 2025 text illustrating final goal, policies and programs
text as defined through public hearing process

Draft Environmental Impact Report – Table of Contents (pages i – vii)

List of Revised DEIR Figures (with attached exhibits)

List of Revised DEIR Tables (with attached exhibits)

List of Significant and Unavoidable Impacts

Summary of City Council Consideration of Land Use Map Designations (April 2007)

Schedule of Public Workshops, Meetings and Hearings

List of Final EIR Preparers

4. Index of Draft Environmental Impact Report and Revised DEIR Public Comments and Final EIR Responses

Comment Reference	Hearing Or Date Received	From	Comment Topic (Note: Please refer to the full set of Comments; summary contained herein is intended for general information only.)	Form of Correspondence	Comment FEIR Volume 6.B or 6.C Page #	Response FEIR Volume 6.A Page #
			MASTER RESPONSE A. ALTERNATIVES			33-36
			MASTER RESPONSE B. FLOODING			36-37
			MASTER RESPONSE C. GREENHOUSE GAS EMISSIONS			37-39
			MASTER RESPONSE D. CASINO IMPACTS			39-42
			MASTER RESPONSE E. RECYCLED WATER (RECYCLED WATER QUALITY, GROUNDWATER CONTAMINATION FROM RECYCLED WATER, PHARMACEUTICALS, AND PHTHALATES)			42-49
			MASTER RESPONSE F. TRANSPORTATION (TRIP REDUCTION, TRANSPORATION, IMPLEMENTATION AND FUNDING, AND SIGNIFICANT AND UNAVOIDABLE IMPACTS AT STUDY INTERSECTIONS)			50-52
1	P.C. 12/12/06	PC Sullivan	Population projection by age at 2025	Verbal	A	52
2	P.C. 12/12/06	PC Miller	“No Project” clarification	Verbal	A	53
3	P.C. 12/12/06	PC Arras	Alternative 2 and 3 information	Verbal	A	53
4	P.C. 12/12/06	Susan Kirks	Opinion on Commission education	Verbal	A	53
5 A, B, C, D, E	P.C. 10/10/06	Dianne Reilly-Torres	Mannion Knoll Park; LOS and Trip Reduction Ordinance; water optimization; Zero Net Fill and run-off	Verbal	A	53
6	P.C. 10/24/06	Joseph Grubaugh	Kelly Creek	Verbal	A	53-54

Comment Reference	Hearing Or Date Received	From	Comment Topic (Note: Please refer to the full set of Comments; summary contained herein is intended for general information only.)	Form of Correspondence	Comment FEIR Volume 6.B or 6.C Page #	Response FEIR Volume 6.A Page #
7 A, B	P.C. 11/14/06	Janice Cader-Thompson	Deer Creek surface water; Biological Reports	Verbal	A	54
8 A, B	P.C. 11/14/06	Mary Glardon	Traffic impacts; flooding and habitat impacts	Verbal	A	54
9	P.C. 11/14/06	Ann Kemmer	Traffic	Verbal	A	54
10	P.C. 11/14/06	Steve Girard	Traffic and Drainage	Verbal	A	54
11	P.C. 11/14/06	Laura Miller	Flooding	Verbal	B	54
12	P.C. 11/14/06	Christie Flum	Utilities, wetlands, traffic	Verbal	B	55
13	P.C. 11/14/06	Hank Flum	Surface Water, groundwater, traffic	Verbal	B	55
14	P.C. 12/12/06	PC Sullivan	Recycled water quality	Verbal	B	55
15	P.C. 12/12/06	PC Chair Dargie	Groundwater impacts	Verbal	B	55-56
16	P.C. 12/12/06	Bill Kortum	Conservation & Water Emergency Plan	Verbal	B	57
17	P.C. 12/12/06	David Bradley	Surface water, mapping (site specific)	Verbal	B	57
18 A, B	P.C. 12/12/06	Bill Bennett	Surface water (Marin Creek); illegal fill	Verbal	B	57
19 A, B	P.C. 2/27/07	PC Sullivan	Global climate change; emergency cell phone access	Verbal	B	57
20 A, B	P.C. 2/27/07	PC Sullivan	Recycled water quality; groundwater recharge	Verbal	B	57
21	P.C. 3/13/07	PC Chair Dargie	River Element; River Plan	Verbal	C	57-58
22 & 23	P.C. 3/13/07	CC Barrett	LOS and LOS assumptions	Verbal	C	58

Comment Reference	Hearing Or Date Received	From	Comment Topic (Note: Please refer to the full set of Comments; summary contained herein is intended for general information only.)	Form of Correspondence	Comment FEIR Volume 6.B or 6.C Page #	Response FEIR Volume 6.A Page #
24 & 25	P.C. 3/13/07	PC Chair Dargie	LOS assumptions	Verbal	C	58
26	P.C. 3/13/07	PC Mills	Project Timing	Verbal	C	58
27 & 28	P.C. 3/13/07	PC Chair Dargie	Timing/Reality of Long-Term Mobility Projects; groundwater recharge	Verbal	C	58-59
29	P.C. 3/13/07	CC Barrett	Base Data – 100-year event	Verbal	C	59-60
30	P.C. 3/13/07	CC Barrett	Project funding/timing	Verbal	C	60
31	P.C. 3/13/07	CC Barrett	Berms need to be higher and stronger	Verbal	C	60
32 A - D	P.C. 3/13/07	CC Barrett	New development drainage concerns; disposal of excavated soil; housing relocation in hazard area; seismic related ground shaking	Verbal	C	60-61
33	P.C. 3/13/07	PC Chair Dargie	Connection fees relate to purple pipe installation	Verbal	C	618
34	P.C. 3/13/07	CC Barrett	Raising tertiary water standards	Verbal	C	61
35	P.C. 3/13/07	PC Mills	Tertiary water and water conservation	Verbal	C	61
36 A - C	P.C. 3/13/07	CC Barrett	PUC standards on resale properties; dumpsite resource recovery area; phase out Redwood Landfill dump59-60	Verbal	C & D	61-62
37 A - I	P.C. 3/27/07	CC Barrett	Casino impacts; County standards for overcross culverts; addressing SCWA's response to DEIR; traffic concerns - DSL financing mechanisms; Sonoma County PRMD's issues regarding traffic; Bike Plan County-wide coordination; Friends of Lafferty Park language; greywater legalities & rainwater collection	Verbal	D	62-63
38	P.C. 3/27/07	PC Arras	Citizens' comments on soil conditions	Verbal	D	63
39	P.C. 3/27/07	CC Barrett	Ban gas-powered landscaping tools	Verbal	D	63
40	P.C. /27/07	Dianne Reilly-	Berms need to be higher and stronger	Verbal	D	63-64

Comment Reference	Hearing Or Date Received	From	Comment Topic (Note: Please refer to the full set of Comments; summary contained herein is intended for general information only.)	Form of Correspondence	Comment FEIR Volume 6.B or 6.C Page #	Response FEIR Volume 6.A Page #
A - D		Torres				
41	P.C. 3/27/07	CC Barrett	Flood control & zero net run-off	Verbal	D	64
42 A - E	City Council 10/2/06	David Keller	Flood management; channelization of the River; Petaluma River Corridor; holding area for storm water; people & property at risk	Verbal	D & E	64-65
43 A, B	CC 10/16/06	Mary Glardon	Level of service; global warming	Verbal	E	65
44 A - C	CC 11/6/06	Sherry Taylor	Low-income and disabled population/housing needs; cost of future development; water supply - % of growth	Verbal	E	65-66
45	CC 11/20/06	Geoff Cartwright	Stop development in floodplain	Verbal	E	66
46	CC 12/4/06	Patricia Tuttle Brown	River Plan (See Comment #73)	Verbal	E	66
47	CC 12/4/06	Geoff Cartwright	Floods & terracing relating to Denman Flats	Verbal	E	66
48 A, B	CC 12/4/06	David Keller	Process of hearings is confusing; surface water element	Verbal	E	66-67
49	CC 12/18/06	Tiffany Renee	Resources, landscape, conservation of watershed	Verbal	E	67
50	CC 12/18/06	Geoff Cartwright	Weir and the widening of the river	Verbal	E	67
51	CC 2/12/07	Geoff Cartwright	Hydrology and bridges (See Comment #71)	Verbal	E	67
52	CC 2/12/07	Walter Kieser	Market study in 2004 for property outside the UGB	Verbal	E	67
53	CC 2/26/07	Wayne Morganthaler	Building a healthy sustainable local economy is key	Verbal	F	67
54	CC 2/26/07	Patricia Tuttle Brown	Mobility section	Verbal	F	67-68
55	CC 2/26/07	CC Rabbitt	Casa Grande @ McDowell hard to navigate	Verbal	F	68

Comment Reference	Hearing Or Date Received	From	Comment Topic (Note: Please refer to the full set of Comments; summary contained herein is intended for general information only.)	Form of Correspondence	Comment FEIR Volume 6.B or 6.C Page #	Response FEIR Volume 6.A Page #
56	CC 3/5/07	Marianne Hurley	Cultural resources	Verbal	F	68
57	CC 3/5/07	Tiffany Renee	Empire Waste's expansion of the landfill	Verbal	F	68
58	CC 3/5/07	Richard Brawn	Unacceptable level of service	Verbal	F	68-69
59	CC 3/19/07	David Keller	Lawsuit filed in Sonoma County Superior Court	Verbal	F	69
60	CC 4/16/07	Geoff Cartwright	Army Corps of Engineers flood-control project	Verbal	F	69
61	CC 4/16/07	Tiffany Renee	Reducing greenhouse gas emission	Verbal	F & G	69
62 A – D	3/5/07	No Wetlands Landfill Expansion	Risks of shipping solid waste to Redwood Landfill; contributory impacts; City waste in its watershed; consistency with an eco-system approach	Letter	5 – 8	69-73
63	3/4/07	Angela Garvin	DSL site	Email	9 – 10	73
64	3/4/07	Mary Glardon	DSL site	Email	11 – 12	73
65 A – C	3/4/07	David Keller	Greenhouse gases; GP policies & program suggestions; Marin Independent Journal article	Email	13 – 16	73
66	3/4/07	David Keller	River-dependent industrial lands & dredging	Email	17 – 22	73
67 A – G	3/1/07	O.W.L. Foundation	Groundwater transmissivity; delivery stats. From SCWA to NMWD; NMWD water purchases; revised Draft Water Policy Statement 2002; letter from John Nelson; SCWA UWMP 2000; evaluation of groundwater resources	Letter with Attachments	23 – 172	73-74
68 A – J	2/27/07	Petaluma Build It Green (PBIG) Program's Stakeholders' Advisory Team	Climate Change; reduction of greenhouse gas emissions; sea level must rise; projections of future energy use; recycled water unit costs; reduce the City's overall water usage; greater efficiency improvements; watershed's groundwater resources; impacts from reduced rainfall &/or snow pack; request to recirculate DEIR. Attachments: 1. Petaluma Resolution # 2005-118; 2. Letter/ from Kathryn W. Egolf, Deputy Attorney General for the State of	Letter with 17 Attachments	173 – 402	74-78

Comment Reference	Hearing Or Date Received	From	Comment Topic (Note: Please refer to the full set of Comments; summary contained herein is intended for general information only.)	Form of Correspondence	Comment FEIR Volume 6.B or 6.C Page #	Response FEIR Volume 6.A Page #
			California; 3. Report on GHG Emission Inventory for all sectors of Sonoma County, CA from the Climate Protection Campaign; 4. Climate Action Plan from Greg Nickels, Mayor of Seattle, WA; 5. Executive Order S-3-05 from Arnold Schwarzenegger, Governor of CA; 6. Press Release announcing signing legislation to Reduce GHG Emissions from the Office of the Governor. 7. Marin County GHG Reduction Plan from the Marin County Community Development Agency. 8. Endorsement of the U.S. Mayors Climate Protection Agreement from the U.S. Conference of Mayors. 9. Building Sector Unites to Confront Global Climate Change from Kristina Kershner, Director Arch. 2030. 10. Stern Review: The Economics of Climate Change. 11. Summary for Policymakers from the Intergovernmental Panel on Climate Change. 12. Adopting the “2030 Challenge” for City Buildings from the Mayors of Albuquerque, Seattle, Chicago and Miami. 13. Global Warming’s Impact on CA – A Fact Sheet of the Union of Concerned Scientists. 14. Our Changing Climate: Assessing the Risks to CA by the CA Climate Change Center. 15. News Story – Global warming: passing the ‘tipping point’ from The Independent. 16. Global warming: the final verdict from the Guardian Unlimited. 17. Battling Climate Change from Business Week (online)			
69 A – J	5/2/05	Bryant Moynihan	Land use classifications; comprehensive land use absorption study; Mixed Use land use; Very Low Density Residential land use; High Density Residential land use; feathering of density; bulk retail land use designation; Urban Separator designation; Business Park/Office land use designations; Industrial to Office land use designation	Letter	403 – 404	79-81
70 A – Z AA – ZZ	12/3/06	O.W.L. Foundation Includes List of Files/Folders Submitted with Letter on CD	Urban Water Management Plan; catastrophic water cut-off plan; restructured agreement for Water Supply; Water Supply; Santa Rosa Plain groundwater basin; Admin. Record <i>O.W.L. et al vs. Rohnert Park et al</i> ; City’s water consumption; monitoring wells; SCWA wells; “Modest growth”; SCWA deliveries; population growth/water	Letter w/CD	405 – 420.5	81-102

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			usage; per capita water consumption per year; three SCWA wells; Ranney collectors; water supply; seawater intrusion; groundwater subsidence (GWS); subsidence measurement results; GWS/groundwater pumping; water supply and demand comparisons; water supply contingency plan; request DEIR T.O.C. update/change; global warming/sea level rise saturation data; State-identified groundwater recharge areas; cumulative impact of City's urbanization; City's estimates of surface flows Impending change in rainfall patterns; 100-yr storm with 2025 buildout; development in flooded areas; changes in sea level in 100 years; cause of "New Year's Flood"; "nutrient levels"; increase in storm runoff; estimated amount of additional pollution; DEIR Fig. 3.6-2; DEIR Fig. 3.6-2; Wilson Grove Formation Highlands; DEIR Fig. 3.6-2; groundwater pumping expectations; future peak demand shortfalls; temporary impairment MOU; GP 2025 goals 8-G-3 & 8-G-4; recycled water; sewage treatment; emerging toxicants in treated wastewater; scientific testing of treated wastewater; emerging toxicants in treated wastewater; water supply, groundwater, global warming, wastewater contamination, casino impacts, litigation with Rohnert Park including Rohnert Park General Plan and EIR, etc.			
71 A – I	12/4/06	Geoffrey H. Cartwright	Widening & terracing of the channel; Corps of Engineers flood control project; development/fill in floodplain; zero net fill policy; storm frequency calculation; Cherry Magnolia conduit; detention/retention basin systems; typo in DEIR; concerns about the process	Letter	421 – 422	102-103

Comment Reference	Hearing Or Date Received	From	Comment Topic (Note: Please refer to the full set of Comments; summary contained herein is intended for general information only.)	Form of Correspondence	Comment FEIR Volume 6.B or 6.C Page #	Response FEIR Volume 6.A Page #
72 A – H	12/3/06	Gregory L. Colvin	6 acres of trail on Davidon site; 14 acres of urban separator on Davidon site; Urban Separator; neighborhood park classification; Davidon passive park; scientific/engineering analysis – Davidon; Helen Putnam Park; public park on Davidon site	Letter	423 – 424	103-105
73 A – O	12/4/06 2006	Patricia Tuttle Brown	Petaluma River Access & Enhancement Plan; River Plan not referenced in DEIR; area around Factory Outlets; separate Rainier & Corona Reach in DEIR; road diet; Chapter 3's usage of CPSP term; CPSP traffic improvements; Fairgrounds; Cavanaugh Landing; parking reduction impacts; joint use agreements for Schools; Bay area 2005 ozone strategy; PBAC; SPARC; green building.	Letter	425 – 434	105-108
74 A – O	12/5/06	Chey Moore	Hillside ordinance and standards	Email	435 – 436	108
75 A – F	12/2, 10/2 & 8/30/06	P.L.A.N. (Paula Lane Action Network)	1436 Western Avenue; changes to Draft GP 2025 & DEIR; grassland/Oak savannah definition; Fig. 3.8-1 (habitat areas & special status); glossary; evolving Chapter on Historic Resources	3 Letters	437 – 472	108-117
76 A, B	10/16/06	Bryant Moynihan	Land Use Map designations; Hummel discussion	Letter	473 – 474.3	117
77 A – K	10/27/06	Terry Roberts, Director, State Clearinghouse	GP vs. Comp. Airport Land Use Plan; noise problem; height of buildings; school site investigation; hazardous wildlife populations; incompatible land use encroachment; Dept of Toxic Substance Control; wildland fires; Table 3.2-5 on pg. 3.2-9; AM peak hour analysis of U.S. Hwy 101; freeway peak-hour V/C ratio & existing LOS	Letter	475 – 488	117-123

Comment Reference	Hearing Or Date Received	From	Comment Topic (Note: Please refer to the full set of Comments; summary contained herein is intended for general information only.)	Form of Correspondence	Comment FEIR Volume 6.B or 6.C Page #	Response FEIR Volume 6.A Page #
78	11/27/06	Joseph Grubaugh & Sigrun Seifert	Kelly Creek; privately owned, maintenance concerns.	Letter with map & photos	489 – 516	123
79	9/11/06	Ron Bendorff, CDD Dir., City of Rohnert Park	Regional mobility system; proportionate fair share of CIPs. Expand 5-P-12 to include share of regional improvements; excerpt from Rohnert Park General Plan.	Letter with attachment	517 – 520	123
80	9/25/06	Kate Brolan	Retail planning, does not support big box development.	Email	521 – 522	123
81	10/11/06	Emma Webber	Retail businesses, not in support of expansion	Letter	523 – 524	123
82	9/30/06	PSC ³ (Petaluma Small Craft Center Coalition)	Recommended GP text amendments regarding small craft use of River and facilities to support that use.	Letter	525 – 528	123
83	11/14/06	Susan Kirks	Urban separator: request for 100' of width in Paula Lane area; also retention of Land Use designation of Rural Residential. Support for open space project.	Email	529 – 530	123
84	11/16/07	Susan Kirks	West Hills, see comment #83.	Email	531 – 532	123
85	12/18/06	Geoffrey Cartwright	Hydrology: questioned assumption of Corps of Engineers assessment and concept of terracing.	Letter	533 – 534	123-124
86	2/11/07	Brock Dolman	Rainfall harvesting; support for inclusion of policies and program to allow use.	Email	535 – 538	124
87	2/23/07	Paul Palmer	Residential greywater, support for inclusion of policies and programs to allow or mandate use.	Email	539 – 540	124
88 A – E	3/8/07	Ellen Bicheler	Water; water conservation measures; retrofitting; rainwater harvesting; greywater systems. Attachments: 1. Additional Resources: Greywater, rooftop gardens; 2. Catching, conserving, and using water; 3. Constructed wetland & infiltration basin section; 4. Greywater policy center; 5. saving rain for a sunny day	Letter w/5 Attachments	541 – 594	124

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89 A – L	3/14/07	David Keller	Local & regional traffic congestion; water supplies from SCWA; wastewater discharges; groundwater pumping; - Hwy 101; emergency room & health care needs; low-income housing demands; sales tax shifts; local air/water pollution; regional greenhouse gas emissions; wear & tear on local roads; revised focused draft EIR	Email	595 – 604	124-126
90 A – C	3/15/07	Larry Modell, Friends Lafferty Park	Lafferty Park, suggested changes to G-P-13; clarification of graphic in DEIR.	Letter	605 – 606	126
91 A, B	3/16/07	Larry Modell for Pet. Tomorrow	Sea level rise; global climate change/fossil fuel scarcity; need to replace energy source with renewables.	Letter w/Argus Courier article attached	607 – 614	127
92	3/18/07	Geoff Cartwright	Hydrology; water quality beyond the life of the General Plan.	Email w/Letter	615 – 616	127
93 A – G	3/19/07	Gary Helfrich, Planner I from SCPRMD	Traffic; Sonoma County's GP2020 DEIR traffic analysis; fair share funding of regional transportation improvements.; road diets; bicycle circulation; surface water management policies; groundwater protection	Letter	617 – 622	127-131
94 A – J	3/19/07	Marilee Montgomery, Press Liaison for STC101	Reservation shopping/casinos; Community facilities, Design, character and sustainable building; over-development of ag. Zoned land; mobility; recreation, music, park & the arts; community facilities, services & education; water resources; economic health & sustainability; health & safety; housing	Letter	623 – 630	131-132
95 A – C	3/19/07	Kristin Schenone of Morgan Miller Blair	Transportation impacts; recirculation of DEIR; analysis of changes in land use designations	Letter	631 – 634	132-133

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End of Volume 6.B. Please see Volume 6.C for the full text of remaining comments						
96 A – N	3/19/07	Randy Poole for Sonoma County Water Agency	Water supply; SCWA water supply assumptions in DEIR; groundwater basin; water conservation programs; reduce peak summertime water demands; water conservation measures; clarification of policy 8-P-30 – river/creek setback; clarification of policy 8-P-30 – Study; coordination w/SCWA re: XP-SWMM; policies 8-P-31 & 8-P-32 – inundation areas – clarify; clarification of policy 8-P-31-A – Corps project; clarification of policy 8-P-33 – channel maintenance; buildout conditions – assumptions; level of stream maintenance	Letter	635 – 640	133-138
97 A – F	3/19/07	Barry Albert Bussewitz	Reducing GHG emissions; green design principles; limit on retail store sq. ft.; future nearby casinos; maintain historical animal corridors; prohibit future loss of ridgetop/hilltop access	Email	641 – 642	138
98 A, B	3/19/07	Craig Lee Chrisco	Regency project-specific; sufficient water supply for big box retail	Email	643 – 644	139
99 A – D	3/19/07	Janice Cader-Thompson	Water supply; land use; impact of new retail uses on existing retail; traffic pattern changes	Email w/Attached Letter	645 – 648	139-140
100	3/19/07	Ken Burgess	Water conservation; BMP, greenhouse gases Attachments: 1. Home Economics by Ned Orrett, MS, PE; 2. Pay-As-You-Save Energy; 3. More Distributed Generation With Pay-As-You-Save; 4. A Preliminary Analysis of the Cost Effectiveness of Potential PAYS® Products in Missouri	2 Emails (1 w/4 Attachments)	649 – 720	140

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101 A, B	3/28/07	David Keller	Denser infill housing; reduce greenhouse gas emissions	Email/ with 3-27-2007 Sacramento Bee article	721 – 728	140-141
102 A – J	3/27/07	Diane Reilly Torres	Level of Service; increase in trans. Energy consumption; Bay area 2005 ozone strategy; definition of timely; planned roadway improvements; North Petaluma Blvd grid; Rainier Ave and DSL site; intersection impacts at Rainier & DSL sites; preserve the pedestrian environment in Central Petaluma; increased motor traffic impacts	Email	729-734	141-143
103 A – E	3/28/07 (<i>date rec'd.</i>)	Tiffany Renee	Water demand; urban water mgmt plan; particulate matter; auto pollution from Hwy 101; renewable sources of energy	Letter	735 – 738	143-145
104	3/12/07	R.B.G. Naidu	Rezoning of parcels on Petaluma Blvd. N.	Faxed Letter	739 – 742	145
			<i>Duplication – Removed</i>		743 – 748	
105 A – E	10/26/06	Sonoma State University, Northwest Information Center	Native American cultural resources; historical resources; known archaeological resources; historic remains; GP text comments	Letter	749 – 752	145-146
			<i>Duplication – Removed</i>		753 – 766	
106	9/21/06	State Public Utilities Comm.	Rail safety factors	Letter	767 – 768	146
107 A – J	9/16/04 & 10/30/06	California Regional Water Quality Control Board	Development along the river corridor – floodplain capacity; existing agricultural lands; mitigation bank; pollutants; sediments loads; overall hydrology; habitat loss & water quality impacts; feasibility of preserving parcels; wetland, riparian & upland habitats; Petaluma River – impaired waterbody.	Letters	769 - 776	146-147

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108 A – Z AA – GG	10/31/06	Morrison & Foerster and Basin Street Properties	Analysis of alternatives in the EIR; water supply; southern crossing; ineffective, vague & uncertain GP policies; future plans & studies; realistic water analysis & capacity; Public Resources Code § 21083.3; Land Use & Mobility Alternatives Report; Central Petaluma Specific Plan (CPSP); segments the project; proposed water supply; development code & the zoning map; evaluating land use impacts; farmland; impacts at six study intersections; Transportation Demand Mgmt. (TDM); parking impacts; traffic impacts; future freeway operations; park standard; dedication of park land; river-dependent industrial; police officer staffing; public utilities and energy; hydrology & water quality; biological resource impacts; noise; hazardous material; impact overview; analysis of growth/growing impacts; alternatives analysis; DEIR recirculation	Letter with attachments	777 - 796	147-160
109 A - E		Smith Engineering on behalf of Morrison and Foerster	General lack of good faith effort to disclose impact; analysis of alternatives; land use alternatives; population totals; transportation improvement projects & assoc. impacts	Letter	797 - 810	160-164
110 A – Y		Grassetti on behalf of Morrison & Foerster	Alternatives; vaguely worded policies; future plans and studies; environmentally superior alternative; cumulative impacts analyses; project impact on six intersections; TDM program; identify increased funding sources; policy to reduce parking impacts; addition of 15,600 citizens/reduce student by 15%; 21 new police officers; available water supplies; studying the 100-year flood	Letter	811 - 847	164-172

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			zone; widespread very-high liquefaction potential; mitigation for loss of habitat & special status species; impact assessments for special status species; aircraft noise; development on hills; intersection operation, etc.; growth inducing impacts – groundwater; cumulative impacts – flooding, water quality; cumulative biological impacts; project's significant environmental impacts; traffic assessment; environmentally superior alternative			
111	10/31/06	Ryder Companies	Brody Ranch – floodplain (site specific)	Letter	849 - 850	172
112	10/31/06	Philip Williams & Associates (PWA)	Surface water impacts and analysis	Letter	851 - 852	172
113 A, B	10/12 & 11210/30/06	Steefel, Levitt & Weiss (on behalf of DSL)	Previously requested revisions to land use designation; DSL site (site specific)	Letter	853 - 860	173
114 A – F	0/29/06	Regency Center	GP text comments: mixed-use designation/Washington core; sustainable building; air quality; community parks; neighborhood parks; water conservation policies and programs	Letter	861 - 864	173
115 A – P	11/13/06	Petaluma River Council	Channelize & terrace Willow Brook; overtopping weir & flood walls; downstream impacts; base flood elevations; floodplain storage; engineering prediction; modeling; Marin Creek; basin-wide city & county for zero-net increment; stream-side growth & habitat improvements; equilibrium conditions; zero-net fill requirements; XP-SWMM; Petaluma flood control project FEIR; comment noted; floodplain management	Email	865 - 868	174-177
116	11/15/06	Friends of the Eel River	Current hearing process; environmental review guidelines; agendas and public notices vague; new public	Letter	869 - 874	177-178

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A – D			review period & hearing formats required			
117	8/11/04	Pamela Tuft, City of Petaluma, General Plan Administration	Notice of Preparation (NOP) of Draft Environmental Impact Report announcement	NOP of a Draft EIR	875 – 882	178
		List of Responses to NOP			883 – 884	
			<i>Deleted duplicate, see comment #108</i>		<i>885 – 888</i>	
118 A – G	9/10/04	City of Rohnert Park	GP and its associated growth; traffic analysis – Graton Rancheria casino; traffic analysis; increased traffic congestion; water & sewer capacity; regional air quality impacts; solid waste disposal.	Letter	889 – 908	178-179
119 A – C	8/24/04	Dept. of Fish and Game	Flora & fauna; take of species of plants; Streambed Alteration Agreement (SAA)	Letter	909 – 910	179-180
120 A, B	8/31/04 & 1/22/92	North Marin Water District	Petaluma Boulevard South industrial area; attached comments dated January 22, 1992	Letters	911 – 938	180
121 A, B	8/28/04	Petaluma City Schools	Junior High & High school locations; Elementary school, long range needs.	Letter	939 – 940	180-181
122 A, B	9/30/04, 6/14/04, 2/26/03, 8/11 & 8/23/03	Sonoma County Water Agency	Water Supply and Transmission System Project; stormwater management	Letters	941 – 956	181
123 A – E	9/10/04	SCPRMD	Planning area boundary rationale; land use; open space; traffic (incl. attached Guidelines); water	Letter w/5 Attachments	957 – 988	181-183
124	9/14/04	Department of Transportation	Level of service analysis, recommendations for consideration in preparing DEIR.	Letter	989 – 992	183

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125	8/25/04	Management & Performance Consulting	Petaluma Municipal Airport, careful consideration of the Airport Master Plan should be included.	Email w/2 Attachments	993 – 1004	183-184
126 A, B	8/22/04	Richard E. K. Brawn	Environmental impact considerations; environmental impact considerations/specific values	Letter	1005 – 1008	184
127 A – I	9/1, 7/7 & 3/22/04	P.L.A.N. (Paula Lane Action Network)	Biological resources in Land Use Alternative Report; potential loss of open space; hydrology; noise; lighting and glare; traffic; historic preservation; visual/aesthetic; cumulative impacts	Letters	1009 – 1036	184-186
128 A – C	9/21/04	Abrams Associates	Washington-McDowell intersection; traffic conditions/improvements; note to property owner	Letter	1037 – 1038	186
129 A, B	9/30/04	Diane Reilly Torres	Thank you to staff; Petaluma River Flood Control Project	Email w/Attachment	1039 – 1044	186
130 A, B	3/22/07	National Trust for Historic Preservation	Central Petaluma Specific Plan is flawed; GP text recommendations	Letter	1045 – 1050	186
131 A – E	3/12/07	Marianne Hurley	Historic resources; cultural resources; archeological resources; eligible sites; character vs. historical integrity	Letter	1051 – 1052	187
132	4/16, 4/19 & 5/3/07	David Keller	Global warming, greenhouse gas emissions & watershed management	3 Emails (1 w/LA Times article)	1053 – 1062	187
133 A – E	5/5/07	Accountable Development Coalition, Conservation	Internally consistent GP; global warming; Bakersfield case; sustainability; fiscal & Community Impact Report	Letter	1063 – 1084	187-188

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		Action Fund For Education, Living Wage Coalition, New Economy Working Solutions, North Bay Labor Council, Petaluma Tomorrow, & Sonoma County Conservation Action				
134 A – F	5/7/07	Wayne Morgenthaler – <i>Proprietor of Jungle Vibes</i>	Economic trends; General Plan; local cultural programs; Draft GP 2025 text; economic health element; community character	Letter	1085 – 1098	188-189
			<i>Duplication – Removed</i>		1099 – 1104	
135 A – C	2/21 & 3/22/07	David Keller	Tulsa, OK information; Corps Flood Control Project; construction in the floodplain	2 Emails	1105 – 1136	189
136	3/19/07	Paige J. Swartley, ESQ.	Site specific comment regarding Lands of Davidon – historic barns should be preserved.	Letter	1137 – 1138	189
137 A, B	2/20/07	Janice Cader-Thompson	Water supply; sufficient facts to evaluate the pros and cons of supplying the water development; land use – DSL	Letter	1139 – 1142	189-190
138	5/7/07	Perry, Johnson, Anderson, Miller & Moskowitz LLP	Lafferty Ranch, DEIR adequacy of identification for regional facility.	Letter	1143 – 1148	190

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139	5/7/07	SCPRMD	Lafferty Ranch, request to modify General Plan text to emphasize Tolay Park as regional resource.	Letter	1149 – 1150	190
140	5/7/07	Heritage Homes	See #130 GP text amendments	Letter	1151 – 1152	190-191
141	5/7/07	Marianne Hurley	Benefits of historic preservation and specific suggestions for General Plan text amendments.	Letter	1153 – 1154	191
142 & 143	5/11/07	Diane Reilly-Torres	Urban Water Management Plan/wasting of water for lawn watering; need public input and suggested wording on possible conservation ideas and programs.	Email w/Attachment	1155 – 1158	191
		<i>Duplication – Removed</i>			1159 – 1160	
144	No date	Friends of the Eel River	CEQA / water supply; court decision excerpt.	Blog	1161 – 1162	191
145	5/11/07	Ellen Bicheler	Global warming; encouraging use of proper language in General Plan.	Email w/Attachment	1163 – 1166	191-192
146	5/20/07	Janice Cader-Thompson	Photos of wetlands and habitat.	3 Emails w/Attached Photos	1167 – 1176	192
147	4/20/07	David Keller	Greenhouse gas emissions; excerpted information from AEP and background information.	Email w/Attachment	1177 – 1200	192
148 A – C	5/21/07	Diane Reilly Torres	Water conservation (smart irrigation controller); delineation of flood affected areas; Hazard Mitigation Plan (add flooding) including attachments	2 Emails w/Attachments	1201 – 1232	192
149 A, B	5/21/07	Greenbelt Alliance	Urban Growth Boundary; expansion of UGB	Letter	1233 – 1234	192
150	5/21/07	Diane Reilly	No net increase in peak-day runoff; definition of	Email	1235 –	192-193

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A – C		Torres	“community needs”; Petaluma River Corridor and river terrace		1236	
151	CC 4/23/07	Tiffany Renee	Greenhouse gas emissions / walkable community; consider infrastructure and traffic impacts; flood issues.	Verbal	G	193
152	CC 4/23/07	Ann Kemmer	DEIR model runs (project specific – DSL as Mixed Use).	Verbal	G	193
153	CC 4/23/07	Geoff Cartwright	Project specific comments on DSL site; Base Flood Elevation is higher than historic numbers.	Verbal	G	193
154	CC 5/7/07	Geoff Cartwright	Floodplain channelization and development	Verbal	G	193-194
155	CC 5/7/07	Richard Squaglia	Water supply and infrastructure to handle development.	Verbal	G	194
156	CC 5/7/07	Marianne Hurley	Support for letter written by National Trust for Historic Preservation (see Comment #130).	Verbal	G	194
157	CC 5/7/07	Wayne Morganthaler	Civic economics – money spent at local businesses recirculates 3 times in community.	Verbal	G	194
158	CC 5/21/07	Duane Bellinger	Flooding and water levels over the next 50 years.	Verbal	G	194
159	CC 5/21/07	John Cheney	EIRs don’t work – they are educated guesses. Stop building in the floodplain Flooding	Verbal	H	194
160	CC 5/21/07	Diane Reilly-Torres	Verbatim comments; floodplain development; zone 2A funding limitations; required GP content for floodplain information	Verbal	H	194
161	CC 5/21/07	Geoff Cartwright	Flooding hazards, funding, building in floodplain	Verbal	H	194
162 A, B	CC public comment 2/20/07	Joe Grubaugh	Flooding along Kelly Creek and sea level rise concerns, frequency of 100 year storm events.	Letter	1237-1238	194-195
163	8/3/07	Geoff Cartwright	BCDC report on sea level rise.	Letter	1239	195

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164	8/3/07	Claire McCarthy	CIR's needed for development with outline of basic elements.	Letter	1240-1241	195
165	8/3/07	citizen	Excerpts from West Petaluma Specific Plan and Sonoma County correspondence	Maps	1242-1249	195
COMMENTS ON REVISED DRAFT EIR – GREENHOUSE GAS EMISSIONS OR RECEIVED DURING REVIEW OF REVISED DRAFT EIR						
166	9/6/07	Department of Forestry	Fire safety element standard recommendations	Letter	1250-1259	195
167	11/30/07	Tiffany Renee	The Party's Over – greenhouse gas emissions, excerpt from Sydney Morning Herald and specific suggestions regarding Home Occupation Permits and encouraging aggressive approach to GHG reduction.	Email	1260-1262	195
168 A - V	1/3/08	State of California Attorney General's Office	Air Quality: Greenhouse Gas Emissions background information and specific CEQA requirements, proposed mitigation measures (smart growth, mandatory Mixed Use, identify additional Mixed Use sites, incentives for mixed-use development; increase single family dwelling densities; add policy to require high end of density ranges; adopt a Heat Island Mitigation Plan, strengthen policies to support increase of walking, biking and carpooling to schools, etc.; enforce TDM policies, funding infrastructure improvements in mixed use and high density areas; require Climate Action Plan; require leadership and guidance to specific GHG reduction policies; provide time-frame for green	Letter	1263-1272	195-197

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			building ordinance; recycling for all buildings; expand renewable energy policies and programs; strength and expand use of recycled water.			
169 A - J	1/4/08	Todd Tamura	Greenhouse Gas Emissions, specific comments on halocarbons; CEC inventories; geographical boundaries; clarification of page 3.10-23; estimate for retrofitting fixtures; measures (pg. 3.10-24) are targeting other emissions not necessarily GHG; bus replacement issue; reference to Clear Air and Climate Protection Software (reference to halocarbons); need to include more sources than just buildings, municipal services, solid waste, and transportation (i.e. industrial sources and agriculture). Airplanes and marine vessels were not included; energy usage in street lights not included; Table 3.10-7 is unclear; Table 3.10-8 renewable fuels do not necessarily reduce GHG emissions; questioned credits assumed.	Email	1273-1275	197-200
170 A - J	1/7/08	David Keller on behalf of Petaluma River Council	Air Quality, Greenhouse Gas Emissions; failure to meet Council commitment to GHG emissions reduction; vehicles miles traveled not addressed adequately; and list of potential mitigation measures (park locations and improved transit system, more aggressive programs, mandatory green building, require solar.	Email	1276-1278	200-201
171 A - K	7/17/07 & 1/7/08	Tiffany Renee	Significant reductions through reduction of vehicle miles traveled, renewable energy; proposed policies and programs. Thresholds of significance and targets for reduction; analytical approach used (quantitative,	Letters	1279-1282	201-203

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			qualitative, with or without significance determinations); findings of over-riding considerations; cumulative reductions without quantity of reductions for policies; specific evidence is lacking; GHG effects of City activities; environmental considerations of reaching targets through more thorough set of policies			
172	1/11/08	State of CA. Dept. of Transportation	Commend GHG effort; sidewalk and ITS strategies	Letter	1283-1284	203
173	PC 12/11/07	PC Burton	How much attempt was made to reach the City goals? Ideas such as banning parking in certain areas? Transportation comparison, Contra Costa is lowest, highest is Petaluma; there should be a better way to meet traffic needs through improved traffic means. Did the City look at Rainier and what it does to reduce GHG. Issue with existing Council Resolution which mandates certain goals, finding it difficult to recommend a document does not meet that goal.	Verbal	H	203
174	PC 12/11/07	Richard Brawn	Two issues: error in GP, 2762 I Street incorrectly shown for land use; energy costs have gone up for a reason: 1) dollar devaluation; and 2) cost of petroleum, all aspects of developing petroleum (examples). Conservation is absolutely essential. Leave accommodations wide open so that the individual can take the necessary steps to conserve (don't constrain business and individuals).	Verbal	H	203-204
175	PC 12/11/07	PC Sullivan	In addressing the State's requirements for specificity of solutions, we have opted to be specific for the GP and EIR; concern is that 20 years from now we may have been so detailed that we create something obsolete – how	Verbal	H	204

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			do we respond in the GP. Option of putting policies and programs in a separate document. Should strengthen the language for preparation of a Climate Action Plan to “shall”.			
176	PC 12/11/07	CC Barrett	CEQA only asks that we address existing conditions, therefore the DEIR does not have to meet the local goal. Ideas for mitigation include purchase (i.e. neighborhood) to buy solar panels through a “neighborhood buy” for group discount, excess power could multiply out to neighbors;; also question of “green-collar jobs”, encouragement of design and installation of green improvements; classes at local schools (high school and SRJC) to train people for those jobs; GHG mitigation fee. City should start work on the Climate Action Plan (change may to shall).	Verbal	H	204
177	PC 12/11/07	PC Chair Mills	In favor of fee when mitigations aren’t incorporated into design of projects; agree with ‘shall’ with regard to CAP; the CAP will be the key to implementation of the GP following GP adoption.	Verbal	H	204
178	CC 1/7/08	Mayor Torliatt	Wants less development potential, slowing development; increase transit ridership to a certain percentage and how we are going to get there; what about providing large, sweeping alternatives; we haven’t been given all or some of the alternatives that we could have seen; wants to see GHG mitigation fee.	Verbal	H	204
179	CC 1/7/08	Connie Madden	The City needs to think about how to get there: encourage telecommuting, a Mayor’s bus ride, conservation methods as offered by Ned Orrett, do not allow a million square feet of retail.	Verbal	I	204

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180	CC 1/7/08	Ellen Bicheler	Quote from AG letter, Climate Protection Campaign, compromised to get to 25% reduction commitment, look at solutions proposed by Rohnert Park, community choice aggregation, Ned Orett's ideas on energy efficiency plan, look at Marin County.	Verbal	I	204-205
181	CC 1/7/08	Tiffany Renee	Read submittal (see written comment #171).	Verbal and letter	I	205
182	CC 1/7/08	David Keller	Requested Mayor's comments be submitted as comments on the DEIR (see above comment #178); submitted letter (see written comment #170); Greenhouse Gas calculations needs to be in document; mixed use must be required; GHG references contained in other elements should be included in this document; local retail, local business, telecommuting.	Verbal and letter	I	205
183	CC 1/7/08	Allen Tacy	Bike Plan is an excellent start, need to do more.	Verbal	I	205
184	CC 1/7/08	Patricia Tuttle-Brown	Referenced Attorney General's letter; her participation is the culmination of 14 years idealism, shared history of participation, General Plan needs mandates; three examples: 1) tighten up language, CPSP, page 8 of 27 regarding Land Use; 2) Boost effectiveness of PBAC, include a "shall" that final conditions be provided to the PBAC; 3) On the subject of schools, there are no teeth on school references.	Verbal	I	205
185 A - G	12/27/07	Richard Brawn	Economic annex and city revenue expectations are inaccurate and invalid; base year reflected stability of growth rather than recession; federal operating revenues are declining; liquid fuel energy sources are declining and rising in cost; growth is tied inseparably to energy, new	Letter	1285-1295	205-208

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			technologies will not be available for many years; economic annex does not provide a bottom up analysis of costs, does not include capital expenditures or costs of deferred maintenance; no new taxes will be possible.			
<p>186</p>	<p>11/29/07</p>	<p>U.S. Dept. of Homeland Security – FEMA</p>	<p>Referenced Flood Insurance Rate Map (FIRMs), City’s National Flood Insurance Program (NFIP) participant status; referenced Volume 44 Code of Federal Regulations (44 CFR), Sections 59 through 65 regarding NFIP floodplain management building requirements.</p>	<p>letter</p>	<p>1297-1298</p>	<p>208</p>
<p>187</p>	<p>1/17/08</p>	<p>State of California Office of Planning and Research State Clearinghouse</p>	<p>Acknowledgement of compliance with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.</p>	<p>Letter with copy of Comment #172</p>	<p>1299</p>	<p>208</p>

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DRAFT EIR
Comment #

DEIR/DEIR
Revision

Response

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MASTER RESPONSE A: Alternatives. A number of comments criticized the DEIR for not providing different alternatives than those analyzed in the DEIR, including an alternative that would further reduce environmental impacts. One commenter questioned the DEIR's discussion of identifying an environmentally superior alternative.

As noted on page 5-1 of the DEIR, the California Code of Regulations, Title 14 (hereafter "CEQA Guidelines") require only a "reasonable" range of alternatives. The DEIR is a program EIR for a project - the revised General Plan 2025 - that establishes broad goals, objectives and policies through the year 2025. CEQA recognizes that the scope of alternatives making up a reasonable range of alternatives will vary depending on the nature of the project under review and that only those alternatives that can attain most basic project objectives need be considered. For example, additional alternatives could have been developed that reduce potential impacts resulting from the Proposed Plan (such as alternatives with greater restrictions on development, or alternatives that include expansion of roadway capacity to improve level of service for motor vehicles) but as long as the alternatives chosen represent a reasonable range of the alternatives which meet project objectives, CEQA does not require analysis of all possible options.

The DEIR incorporates by reference at page 1-5 and discusses at page 5-1 two studies which provided the basis for the selection of the alternatives studied, the Petaluma General Plan 2025 Existing Conditions, Opportunities and Challenges Report (October 2002) ("ECOC") and the Petaluma General Plan Land Use & Mobility Alternatives (February 2004) ("LUMA" or "Alternatives Report"). A copy of the LUMA can be obtained through the City Department of General Plan Administration, City Hall. The Existing Conditions, Opportunities and Challenges Report and the LUMA are added to the Technical Appendices as A-3 and A-4, respectively (published under separate covers).

The ECOC identified the Community needs and values, which were identified in the earliest workshops. Through the early visioning and discussion processes more than forty workshops were held between 2001 and 2006. The LUMA was prepared to reflect comments from the public, the consultant teams, and in-house team members. It was distributed to the Council, the various Commissions and made available to the public in February 2004. It allowed the community to weigh the various topics discussed within the LUMA (land use designations, density options, transportation/mobility enhancements, potential surface water impacts, fiscal results, etc.). The City Council early on identified three primary areas of concern: economic health, transportation and water resources, which set parameters for the scope of alternatives considered. Early community input reinforced these issues and added residential densities, opportunities to enhance housing diversity and land use concerns regarding water resources; LUMA, pg. 2. The economic health topic included consideration of diversity of economic activities, a reasonable jobs/housing balance, diversity in housing, as well as enhancing community amenities such as parks, open space, recreation services and opportunities, cultural programs, downtown activity and tourism; LUMA, pg.2. Because the City is largely built out and available land is

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limited by City's Urban Growth Boundary, a moderate, but slower than the historic rate of population growth to keep pace with the continued job growth and retail expansion necessary for economic health was deemed to require some increased density in designated areas; LUMA, p. 2. Other topics included Residential Growth Projections to allow resident growth over the life of the General Plan and its relation to desired retail and job growth, acceptable densities for infill, location and timing of housing, options for adjusting the current 500 residential units per year growth management limit; Surface Water Management including policy options for addressing the River's capacity to carry the 100-year design storm, prioritization of flood reduction concepts, public acquisition and/or access opportunity priorities and collaboration options on regional watershed issues; Mobility which included options for enhancing connectivity and access throughout the community, mode options, acceptable congestion levels during peak traffic periods and trade-offs associated with that congestion, and prioritization and funding of multi-modal enhancements; and, Utility/Infrastructure/Public Facilities and Parks which included options for an acceptable growth rate while reducing water consumption and reusing resources creatively, desired park and open space/population ratio, recreation land acquisition and development priorities; and opportunities for creative joint use (i.e.: flood reduction/open space/mobility alternatives); LUMA pages 2-5.

The alternatives scoping workshops and discussions referenced above recognized that significantly reducing anticipated buildout values and/or down-zoning would not serve the identified objectives for the revised General Plan and for the community as whole through 2025. The City Council provided direction that the General Plan must self-mitigate its identified impacts on the environment and the community to the full extent possible, leading to the incorporation of many policies and measures in the recommended General Plan which reduce its foreseeable impacts. Another important component of the Council direction was precluding any land use designation for the "possible expansion" areas identified in the 1998 Urban Growth Boundary ballot measure and the conclusion that the General Plan 2025 would include the assumption that all urbanized development would occur within the existing Urban Growth Boundary through 2025, rather than through its current expiration date in 2018.

For purposes of a general plan, the required CEQA No Project Alternative is the existing 1987-2005 General Plan, which includes all revisions made to that Plan since its adoption, including the Corona-Ely Specific Plan, Central Petaluma Specific Plan and numerous site-specific land use designation amendments. CEQA Guidelines, Section 15126.6(e)(3)(A). Under the No Project Alternative, discussed throughout Section 5 of the DEIR, development would continue under the same policies and programs contained in the 1987-2005 General Plan.

The two other alternatives were selected based on their ability to meet the project objectives. The impacts of the selected alternatives are compared in Section 5 of the DEIR. The following are the key points on which the three alternatives differ:

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Alternative 1: No Project Alternative – The existing 1987-2005 General Plan.

Alternative 2 (Alt A in the Alternatives Report): Arterial Infill Corridor Development Focus -- This alternative focused on intensification along the arterial corridors leading to Downtown and Central Petaluma. This included infilling or re-using vacant and under-utilized parcels, the latter if they already contain a useful or historic building. The corridors were proposed to serve as centers of urban activity; as gaps in the fabric are filled in and streetscape improvements instituted, they would become attractive boulevards for pedestrians, transit, and autos, reflecting Petaluma's distinctive character on its most heavily traveled roads. This Alternative had the mid-range potential for non-residential development, was mid-range in population projection and the lowest park acreage.

Alternative 3 (Alt B in the Alternatives Report): River Corridor Development Focus – This alternative focused on the provision of new housing opportunities connected to the Petaluma River corridor. In the design of new housing, ample setbacks, in accordance with the Petaluma River Access and Enhancement Plan, would ensure that the River corridor serves as a recreational amenity, accommodates stormwater flows, and preserves river habitat. New higher intensity development would occur beyond the corridor but within ½ mile of the River, and public improvements will focus on connections to and across the waterway. This Alternative provided the highest number of housing units, non-residential development in excess of the proposed project, the highest number of employees and the highest population number.

Alternative C from the LUMA focused on locating and intensifying of neighborhood centers dispersed through the City in an effort to meet the basic needs of neighborhoods. This alternative placed policy emphasis on a wide buffer along the River, with Low and Medium Density housing providing a transition area from the River to more intense uses along the arterial corridors. Although Alternative C had the lowest additional housing and regional/community commercial, it did not incorporate the same smart growth, mixed-use opportunities and infill characteristics of Alt A and B. It was not chosen for further analysis in the DEIR because it was determined through public input and by the Council to have unacceptably greater adverse impacts, particularly to existing neighborhoods.

Direction was received from the City Council to prepare a proposed Plan which incorporated some values of Alternatives 2 and 3 (Alt A and B from LUMA) with additional direction to further reduce densities in specific areas of the community, particularly the western edge, and to result in a reduced population projection from the alternatives identified in the LUMA.

The proposed General Plan 2025 is identified as the environmentally superior project.

The requirement to identify an environmentally superior alternative (CEQA Guidelines section 15126(e)(2)) must be read together with subsection 15126(d), which requires that an EIR compare significant effects of the alternatives with those that would result from the project. Analysis of the alternatives shows that none of the alternatives is clearly environmentally superior to the project, the proposed General Plan 2025. See discussion,

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DEIR, Sections 5.3 and 5.4. In this case, it is sufficient for the EIR to explain the environmental advantages and disadvantages of each alternative in comparison with the project, as is done in DEIR Section 5.3, pp. 5-5 - 5-19. The conclusion regarding identification of the project as environmentally superior to the No Project Alternative and Alternatives 2 and 3 is explained at DEIR Section 5.4.

The recommended project reduces the City's growth rate, compared to growth rates from 1985 to 2005. Petaluma's population grew by 41 percent between 1985 and 2005. The recommended project reduces the expected rate of population increase to 27 percent over the next 20 years (DEIR, page 2-20). The expected total buildout population of 72,707 under the recommended project will add approximately 15,600 residents to the city, an overall annual growth rate of about 1.2 percent per year. Over the past 20 years, the overall annual growth rate has been 1.8 percent per year, although it slowed between 2000 and 2005 (DEIR page 2-20). The proposed General Plan would create a smaller population increase than either Alternative 2 or 3.

Although the No Project Alternative may show lower total buildout population, growth is not measured merely by population numbers. Also, the Draft EIR projections are based on a project baseline set at the time of the Notice of Preparation for the Draft EIR in 2002. Since that time there has been a change in the mix of residential to mixed use development within the Central Petaluma Specific Plan (CPSP) area and several significant site-specific land use changes for approved residential projects (i.e.: Southgate, Park Square, Park Central, Quarry Heights, Lindberg Circle, etc.) from the original 1987-2005 General Plan. As these recent trends indicate, total population under the No Project Alternative could easily amount to more than that of the recommended General Plan 2025. See DEIR discussion, page 5-3. The recommended project also envisions 3.3 million fewer square feet of non-residential development, fewer daily vehicle trips and slight reduction in projected number of employees than the No Project Alternative.

Other examples of reduced impact from the proposed Plan include its additional restrictions on development and increased setbacks along the Petaluma River; significantly reduced development potential in the floodplain areas; minor density increases within the urban core to allow infill development and support transit use and bike/walk opportunities, thereby lessening transportation impacts; increased emphasis on multi-modal mobility infrastructure, again lessening transportation impacts; reduced water demand on potable supply due to expanded conservation and use of recycled water; and improved surface water quality through numerous policies and programs.

MASTER RESPONSE B: Flooding. The burden of providing flood reduction and surface water management mitigation improvements are proportionately spread to development to comply with nexus requirements of matching direct impacts to specific mitigations. Mitigations may include, but not be limited to, creation of riverine terracing, detention ponds, zero-net fill and runoff. Flooding is also a regional issue with increasing storm flows from outlying areas impacting the urbanized areas of Petaluma. The 100-year event

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standard is used, in compliance with FEMA and NFIP standards, for floodplain regulation, design of flood control measures, and riverine project design by state and federal agencies. The 100-year discharge is the discharge that has a 1% chance of being exceeded in any given year, and the magnitude of the estimate varies by location. The first step towards improving our understanding of the frequency and severity of flooding in the City is to improve the estimate of the 100-year discharge.

The National Oceanic and Atmospheric Administration (NOAA) maintains tide data records, including a tide station on the Petaluma River at the upper drawbridge. Tide data is evaluated over a tidal epoch (approximately 18.5 years) in which averages and extremes are computed, such as the mean higher high water (MHHW) which is typically chosen as the downstream boundary condition for floodplain mapping. The MHHW datum is the average of only the higher of the high water elevations, each tidal day, observed over the tidal datum epoch. The Petaluma Upper Drawbridge station was just updated in early 2007 from the 1983 to the 2001 epoch. The MHHW at the Petaluma Upper Drawbridge station increased by about 0.2 feet as a result of updating to the new tidal epoch (which equates to approximately 2 mm/year). However, a data specialist (Stephen Lyles, NOAA Products and Services, March 2007) from NOAA warned that this increase is not necessarily the tide increasing, but it could be a function of inadequate ground survey benchmark data at the upper drawbridge or the conversion from the NGVD 29 vertical datum to NAVD 88 using the VERTCON method.

There is no need to revise the modeling to reflect a higher sea level for the General Plan because the increase due to tidal changes would be the same for existing and proposed buildout conditions, and therefore is not connected to or a function of the proposed General Plan update. In addition, federal regulations stipulate that FEMA mapping is to represent existing conditions, not future conditions, so FEMA mapping cannot be changed to reflect future sea level rise. The tidal areas on the effective Flood Insurance Rate Maps (FIRMs) and profiles for the Petaluma River reflect the 100- and 500-year tide elevation which is based on frequency analysis of tide data (as opposed to the 100- and 500-year storms which are based on frequency analysis of rainfall and/or stream flow data). The downstream boundary condition for FEMA mapping hydraulic calculations was based on the MHHW elevation—not the 100- or 500-year tide elevation—due to the improbability of the 100- year (or 500-year) tide and the 100-year (or 500-year) storm occurring at the same time.

Because the precise amount of sea level rise (if any) is unknown, the City proposes to continue to monitor and if needed, apply stricter development standards to areas falling within the regulatory 100-year floodplain of the Petaluma River downstream of the Corps' transition weir should expansion of the existing floodplain become evident in the future.

MASTER RESPONSE C: Greenhouse Gas Emissions; City Emission Reduction Goals Identified in Resolution 2005-118. Several commenters state that the City's General Plan should adopt policies and mitigation measures which reduce GHG emissions to the City's community-wide goals for reduction of GHG adopted in Resolution 2005-118.

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Commenters have also requested that the threshold for significance for greenhouse gas emissions incorporate the GHG emissions goals adopted in Resolution 2005-118.

On July 18, 2005 the City passed Resolution 2005-118, "Resolution to Establish GHG Emission Reduction Target(s) for the City of Petaluma". Resolution 2005-118 established greenhouse gas emissions reduction targets of 25% below 1990 levels by 2015 for community emissions and 20% below 2000 levels by 2010 for municipal government operations. The City's reduction targets are more stringent than those passed by the State in AB32, the Global Warming Solutions Act. As shown in the Revised Draft EIR, greenhouse gas emissions from the proposed *General Plan 2025* would not be expected to meet the target of 25% below 1990 levels. Emissions in 2025 are estimated to be 562,500 tons per year of CO_{2e}, including reductions from selected General Plan policies and State measures as they apply within Petaluma. To meet the community target, emissions would need to be reduced to 326,200 tons per year (assuming that State measures are successfully implemented).

The significance criterion used in the Revised Draft EIR is as follows:

Impacts of buildout of the proposed General Plan would be significant if they:

- Result in community greenhouse gas emission levels which exceed pre-project levels by a substantial margin.
- Conflict with Assembly Bill 32 and its governing regulations.

The significance criterion does not include a reference to the City's Resolution 2005-118 goals because the Resolution commits to a "rollback" of emissions below the baseline, that is, the conditions existing at the time the General Plan was initiated. CEQA defines an impact as the incremental change in the existing physical conditions as they exist at the time the EIR is initiated (CEQA Guidelines 15126.2(a) and 15125(a)). Both the City and the State have set challenging and admirable goals to reduce GHG emissions to levels below the baseline, however, CEQA presently mandates that impacts be measured from the baseline, and that mitigation be effective at reducing impacts only to baseline levels (CEQA Guidelines 15126.4(a)(4)). While future CEQA Guidelines may be developed to provide further guidance on the evaluation of greenhouse gas effects in CEQA environmental documents, they will not be formulated until mid-2009 and are not expected to take effect until 2010.

Therefore, the Revised Draft EIR has included the City's goals for GHG reduction into the EIR to the extent CEQA allows, and that is to set the significant threshold at baseline or pre-project conditions, and to adopt all feasible mitigation to reduce GHG emissions to that same baseline or pre-project condition.

In addition, of particular note is General Plan Policy 4-P-22, which calls for the preparation and implementation of a Community Climate Action Plan (CCAP). The Community Climate Action Plan is intended to be the implementing mechanism of

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Resolution 2005-118. The CCAP would identify specific greenhouse gas reduction programs, outline how those programs would be implemented, and be reviewed and updated every six months. New technologies and ideas in the field of energy efficiency and greenhouse gas reductions are being developed daily. The CCAP would provide the flexibility and specificity needed to achieve the City's reduction goals more effectively than the General Plan could.

See also Responses 168 and 169 for additional General Plan policies which serve as mitigation.

MASTER RESPONSE D: Casino impacts. One casino project is proposed by the Federated Indians of Graton Rancheria ("Graton Rancheria") in Rohnert Park, and a second has been mentioned in connection with a location south of Petaluma, approximately 27 acres south of the City limits off Highway 101 near Kastania Road. The City and Petaluma voters have made their opposition to casino development on the latter site by the Dry Creek Rancheria Band of Pomo Indians clear through the City Council's placement on the ballot and voters' overwhelming approval of a ballot measure in November, 2006, which authorized the City to take all possible actions to oppose that development. The Dry Creek Pomo project is determined to be too speculative to require inclusion in the cumulative impact analysis for the General Plan 2025 DEIR given the lack of information presently available on use of the site and an opinion of the Associate Deputy Secretary of the Interior, by correspondence dated February 13, 2007, which states, in part:

"...Clearly, the Tribe did not exercise jurisdiction on the subject parcel in 1988, therefore it cannot be used for gaming purposes as a matter of law.... We anticipate changes to the rules that may result in fewer off-reservation properties being accepted into trust. In particular, we expect to consider a paradigm where the likelihood of accepting off-reservation land into trust decreases with the distance the subject parcel is from the Tribe's established reservation or ancestral lands, and the majority of tribal members. Further, we plan to review our approach for soliciting and accommodating the view of elected officials (State, county, city, etc.) and community members in the local area as part of our IGRA Section 20 decisions. We also plan more detailed consideration of the broad implications associated with new gaming operations with established communities where gaming is not currently conducted. Finally, we expect continued Congressional efforts during the 110th Congress to restrict or terminate the options currently available under Section 20. Because the Department has not considered the relative merits of your Section 20 application yet, we cannot advise you further about its prospects for approval...."

The General Plan 2025 EIR is designed to evaluate the impacts of development in Petaluma over its 20 year time horizon within the City's jurisdictional boundaries and cumulative effects of that development combined with certain extra-territorial projects. The General Plan EIR is not required to evaluate the direct impacts of possible projects outside of the

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City. Those impacts for a proposed Rohnert Park casino have been studied in a project-level draft environmental study under federal law, titled “Graton Rancheria Casino and Hotel Environmental Impact Statement,” published in March 2007 (“EIS”). The EIS is not yet final. It also must be recognized that the City has no control over approval of the Graton Rancheria project because the project is proposed by a sovereign tribe, which is not subject to local land use or zoning approvals or CEQA and because the project is outside the City’s boundaries. Therefore, the City can not impose conditions or mitigation measures on the project.

As to the City’s General Plan, the physical impacts of a reasonably foreseeable extra-territorial project may be considered in the General Plan EIR to the extent they contribute to impacts from the General Plan itself on a cumulative basis. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR, i.e. Petaluma’s General Plan 2025. CEQA Guidelines, Section 15130(a)(1). The study of these cumulative impacts is required to be less detailed for a programmatic EIR like the General Plan EIR than it would be for a specific development project level EIR. See CEQA Guidelines Section 15152(b). Discussion of cumulative impacts need not be as extensive as that used for effects of the General Plan itself. CEQA Guidelines, Section 15130(b).

For purposes of the City’s General Plan 2025 cumulative impact analysis, a prior location considered for the Graton Rancheria project near the intersection of Lakeville Highway and State Highway 37 is not considered reasonably foreseeable. The impacts of using that site, including its impact on views and baylands restoration along the northern edge of San Pablo Bay led to widespread community, environmental and political opposition. The City believes that the Tribe’s donation in 2003 of the majority of its property at that site to the Sonoma County Land Trust and identification of sites in Rohnert Park acknowledge that evaluation.

The traffic impacts identified in the General Plan DEIR already include measurement of traffic from a prospective casino in Rohnert Park. The City of Petaluma provided land use information to Sonoma County for inclusion in the County’s traffic model that the County used to evaluate potential traffic impacts resulting from the Sonoma County General Plan 2020. The County study and traffic model included a Graton Rancheria casino project in Rohnert Park as one of the cumulative projects in its impact analysis for the County of Sonoma General Plan 2020 EIR. See Sonoma County General Plan 2020 (March 2006), page 6.0-4, available at <http://www.sonoma-county.org/prmd/docs/eir/gp2020deir>. The City’s General Plan “Future with Project” PM peak hour freeway volumes shown in the General Plan 2025 DEIR were pulled directly from the County model, which included casino trips on U.S. 101. The City’s DEIR at page 3.2-29 provides an explanation of the use of the County model. Regional casino-generated traffic through or to and from Petaluma, was assumed to use Highway 101. In this way, casino trips were included in analysis of cumulative traffic impacts resulting from the General Plan 2025. The City’s model run for the AM peak hour did not specifically include AM casino trips aside from general growth

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in trips to and from the north on Highway 101, but it is a fair assumption that the casino will not generate a large amount of AM peak hour traffic.

To the extent the City's General Plan development contributes to regional traffic impacts, it has identified policies and programs to mitigate that impact by supporting the concept of identifying regional transportation needs and cooperative means to propose improvements, including imposition of fair share contributions to measures designed to alleviate regional traffic impacts.

The General Plan 2025 will update and revise Policy 5-P-12 as follows:

Cooperate with local jurisdictions, County, State and Federal agencies toward identifying and implementing regional improvements to the network.

A. Work with CalTrans and the Sonoma County Transportation Authority (SCTA) to achieve timely implementation of programmed freeway and interchange improvements.

B. Designate SCTA as the agency with the overall responsibility for regional circulation and transit coordination between the City and County.

C. Work with the County and SCTA to develop regional/subregional fees and/or allocate a fair share contribution to accommodate transportation demand created by new development.

This is an adequate and appropriate means of mitigating regional cumulative impacts. CEQA Guidelines Section 15130(a)(3). Again, it must be recognized that the City's responsibility is to evaluate impacts from its General Plan, not all impacts of the Graton Rancheria project, if and when those occur. See, also Responses 93A-C.

As to cumulative impacts on increased regional and local air pollution, the DEIR determined that the proposed General Plan's compliance strategies would enable the City to adhere to the relevant air quality thresholds, resulting in a less-than-significant impact under CEQA. The Revised DEIR, Greenhouse Gas Emissions, concludes that the General Plan's cumulative impact on greenhouse gas emissions and climate change is significant and unavoidable because of the unsettled status of regulatory thresholds; the difficulty of measuring the success of national, state and local reduction measures in the City of Petaluma; and the difficulty of measuring both the effect of City measures on the global climate and the effects of global climate change elsewhere on Petaluma. This cumulative analysis of greenhouse gas emissions within the General Plan study area and the conclusion of significant and unavoidable impact would not change with the addition of impacts from a casino project. Quantification of emissions from whatever casino project might be implemented, if any, is beyond the scope of the City's General Plan EIR and not required. As noted above, the City has no power to impose greenhouse gas emissions mitigation, or any mitigation, on a future casino project.

The Graton Rancheria project is located approximately ten miles outside Petaluma's boundaries. The City will not be providing water, wastewater, police or fire services to any

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prospective casino project and therefore no new cumulative impacts on such services require analysis in the DEIR.

Possible economic and social issues from casino impacts, including, as two commenters noted, an effect on Petaluma's "identity and character;" citizens being drawn away from other recreation, music, parks and arts "as citizens are drawn to the illusive hope of instant wins at tribal casinos;" diversion of disposable income; school impacts based on assumptions that "imported workforce children" will be multi-lingual; possible increased demand for low-income housing, etc., are not required to be analyzed in the General Plan DEIR. For CEQA purposes, "Economic and social changes resulting from a project shall not be treated as significant effects on the environment." CEQA Guidelines Sections 15064(e) 15382, 15131; Public Resources Code Sections 21061.5, 21151(b). Here, the cited potential impacts are economic and social changes that do not arise from the General Plan, do not arise from or cause physical impacts in Petaluma and which are speculative. Even if evidence of physical change had been provided, it would be at most an indirect physical change. CEQA Guidelines Sec. 15064(d)2). An indirect physical change may be considered only if it is reasonably likely to occur, and a change which is speculative or unlikely to occur is not reasonably foreseeable. CEQA Guidelines Sec. 15064(d)3).

One comment stated that study of cumulative impacts from a casino would require recirculation of the DEIR. Court decisions on recirculation confirm that the standard for recirculation under CEQA is stringent. *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112 ("Laurel Heights II"). Recirculation is only required when the addition of new information to a DEIR "deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect..." that the City has declined to implement. *Laurel Heights II*, 6 Cal. 4th 1112, 1129. As noted above, cumulative physical impacts of casino development have been included in the DEIR analysis. Social and economic impacts as well as direct impacts of the casino project, rather than the General Plan, do not require inclusion in the DEIR. The comments responses and information added to the DEIR do not contain or identify a new significant physical environmental impact, a substantial increase in the severity of an impact that would result from the cumulative impacts of the project (the City's General Plan 2025), or a feasible mitigation measure which might reduce future cumulative project impacts, but which is not adopted by the City. Therefore, recirculation is not required. CEQA Guidelines, Section 15088.5.

MASTER RESPONSE E: Recycled Water

Recycled Water Quality. The Hopper Street Water Pollution Control Plant has been supplying secondary treated recycled water for urban and agricultural irrigation since the 1980s. The microbiological and chemical quality of the tertiary recycled water that will be produced at the Ellis Creek Water Recycling Facility will be far superior to the quality of secondary effluent used in the past 20+ years for similar applications—and with no known ill effects. The City holds Waste Discharge Requirements and a Master Reclamation Permit

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(NPDES Permit number CA0022764) from the San Francisco Bay Regional Water Quality Control Board (RWQCB) that permits the existing urban and agricultural reuse program. The City has submitted a Notice of Intent (NOI) for land application of the new tertiary treated recycled water under the General Water Reuse Order No. 96-011 to the RWQCB and the California Department of Public Health (DPH), and has already received approval from DPH and RWQCB for the project, to the extent the agencies can approve the project prior to the Ellis Creek Water Recycling Facility being operational.

The City of Petaluma intends to comply with the provisions of California Water Recycling Criteria¹ in full for its proposed irrigation use. The California Water Recycling Criteria are the most stringent regulations for control of water reuse anywhere in the world, intended to protect the public health with multiple barriers to contaminants and pathogens. Based on scientific information available, no evidence exists that application of recycled water for any of the 43 uses specifically allowed under Title 22 has led to or may lead to contamination of surface or ground waters in the over 4,000 sites currently and historically using recycled water in California. The majority of these water recycling sites are irrigation sites either for agriculture or for landscape.

Groundwater Contamination from Recycled Water Used for Irrigation. The City will minimize potential for impacts to groundwater through compliance with the California Water Recycling Criteria, which assure that recycled water is applied at rates that can be readily absorbed and not in excess of the capacity of the soil to hold and the plant cover to evapotranspire². Thus, any excess irrigation water moving below the root zone would be far below any intentional groundwater recharge percolation rates. There is a quantitative and a qualitative difference between a purposefully planned groundwater recharge and the movement of leachate from landscape irrigation toward the water table. Groundwater recharge involves large volumes of water being introduced into the aquifer over a given period of time^{i, ii, iii}. With irrigation leachate, an extremely small volume of water may percolate through the soil column³, the vadose zone, and the saturated zone, before arriving at the water table, mixing with ambient groundwater, and eventually becoming part of the groundwater system. In the process of this movement the organic content of the water leaving the root zone will be adsorbed, transformed, decomposed and not be detectable in the groundwater⁴.

Biological, microbial, chemical and physical processes occur at the soil surface, in the vadose zone, and in the saturated zone. These processes result in adsorption, dispersion,

¹ (California Code of Regulations Title 22, Division 4 Chapter 3 Section 60300 et. seq.)

² §60310(e) of the California Water Recycling Criteria (Title 22 Code of Administration) requires rigorous site controls such that the amount of applied irrigation water is precisely delivered to meet the evapotranspiration needs of the plants contained within the irrigated area, with no overspray, runoff, mist... An irrigation system designed and operated to such level of precision will involve minimal excess water exiting the root zone.

³ By contrast, intentional groundwater recharge projects push hundreds of inches of water per year into the recharge basins.

⁴ Crites, R. .W. *et al.*, 2006 "Recycling in Hawaii: A Study Looks at the Feasibility of Applying Recycled Water on Land Above Potable Water Aquifers in Hawaii", *Water Environment and Technology*: Vol. 18, No. 5, May 2006, pp 45-47.

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dilution, decomposition of most organic and many inorganic compounds along their path of migration toward the water table^{iv}.

Based on the ability of the soil and the vadose zone to destroy organic compounds and filter them out of the percolating water (see three studies summarized below), it would appear that irrigation use of recycled water is environmentally preferable to discharge of effluent to receiving waters. Also, from an energy consumption perspective, use of tertiary recycled water for irrigation would avoid the need for higher levels of treatment—such as reverse osmosis—and their much bigger carbon footprint. All things considered, recycled water use for irrigation of landscape and agriculture is more environmentally sustainable than the available alternatives.

THE LAWRENCE LIVERMORE NATIONAL LABORATORY STUDY:

One site, in particular, using recycled water for irrigation for nearly 30 years was studied in some detail for possible transmission of endocrine disrupting compounds^v. The results confirmed that EDCs present in the tertiary recycled water had not reached the water table over that time period. Biological, chemical and physical processes in the soil surface, in the vadose zone, and in the saturated zone adsorb, decompose, and efficiently destroy any organic compounds remaining in low concentrations in tertiary recycled water. The following is quoted from the paper published by Lawrence Livermore National Laboratory regarding that study:

EDCs such as 4-nonylphenol (NP) and 17 β -estradiol were studied not only because of their potential estrogenic effects on receptors but also because they can be useful as tracers of wastewater residue in groundwater. Since the compounds were expected to occur at very low (part per trillion) concentrations in groundwater, highly selective and sensitive analytical techniques had to be developed for their analysis. This project assessed the distributions of these compounds in wastewater effluents and groundwater, and examined their fate in laboratory soil columns simulating the infiltration of treated wastewater into an aquifer (e.g., as could occur during irrigation of a golf course or park with non-potable treated water). Bioassays were used to determine the estrogenic activity present in effluents and groundwater, and the results were correlated with those from chemical analysis. In vitro assays⁵ for estrogenic activity were employed to provide an integrated measure of estrogenic potency of environmental samples without requiring knowledge or measurement of all bioactive compounds in the samples.

For this project, the Las Positas Golf Course (LPGC) in the City of Livermore provided an ideal setting. Since 1978, irrigation of this area with treated

⁵ In vitro assays are performed in the laboratory, using highly controlled environments to establish cause and effect by eliminating as many potential variables and external influences as possible.

⁶ Ng/L, i.e., nanograms per liter, represent parts per trillion

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wastewater has dominated the overall water budget. For a variety of reasons, a group of 10 monitoring wells were installed to evaluate wastewater impacts on the local groundwater.

NP was not detected in LPGC groundwater (detection limit, 11 ng⁶/L) despite average concentrations of 3000 ng/L in the irrigation water (i.e., LWRP tertiary-treated effluent); these results cannot be explained by low analytical recovery in groundwater samples, since recoveries were from 62 to 90% for the labeled NP internal standard. Maximum concentrations of the APEO metabolites AP1EC and AP2EC in LPGC groundwater were from 130- to 360-fold lower than in irrigation water. Since hydrological modeling indicates that irrigation water was diluted only 33 to 73% with local precipitation in the aquifer, attenuation of these compounds during transport through the vadose zone and saturated zone (e.g., by sorption of the APEO metabolites) must have been very substantial. High sorptive attenuation of NP is consistent with laboratory column studies and modeling conducted for this project. The estrogenic bioassay showed a significant response to the LWRP samples that contained approximately 3 mg/L NP. No significant luciferase response was noted for cells exposed to LPGC groundwater, which was consistent with analytical data showing no detectable NP or steroid estrogens in the groundwater samples.”

THE CENTRAL OAHU AQUIFER STUDY

Another highly controlled research project was conducted on a relatively permeable soil above a potable water aquifer in Oahu, Hawaii. The results of this study showed the ability of the top five feet of soil to block transmission of hormones (endocrine disrupting compounds) and pesticides applied in irrigation water to bare soil and turf^{vi}. After one year of applying recycled and control irrigation waters at agronomic and double the agronomic rates to replicated and randomized plots, no significant differences were found in the percolate (at the five foot depth) between recycled and control plots with regard to estradiol, estrone, atrazine, lindane, total organic carbon, and NDMA. In fact, the hormones and pesticides were not detected in any of the percolate samples. By contrast, inorganic compounds (salts) were present in the percolate from the recycled plots at higher concentrations than in the control plots—as would be expected. The following is directly quoted from the journal *Water Environment and Technology*:

The percolate quality of plots irrigated with recycled water was not significantly different in total organic carbon and other constituents of concern. Therefore, recycled water irrigation above the unconfined aquifer in central Oahu will not impact groundwater quality negatively.

THE UNIVERSITY OF CALIFORNIA AT RIVERSIDE STUDY

N-nitrosodimethylamine or NDMA is a microconstituent of some concern because of its

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high mobility, ability to pass through reverse osmosis (RO) membranes, and potential carcinogenicity. A recent study^{vii} investigated the possibility of NDMA movement through the soil and its potential to contaminate groundwaters. Percolates were collected at 1 m (3') depths below irrigated fields. Fields with different soil types were tested. The results indicated that NDMA was volatilized in the upper layers of the soil and did not reach the 1m depth. The paper's conclusion states:

In conclusion, although perceived as a high-leaching contaminant, NDMA introduced through surface irrigation of recycled wastewater was found to not leach through 1-m profile of turfgrass soil under field conditions. The limited NDMA leaching was likely due to rapid NDMA volatilization that was a result of its volatility and active upward water movement in the turf grass system. As the field irrigation study was carried out under scenarios that were conducive to rapid leaching of NDMA, it may be concluded that most of the NDMA applied to soil will not leach to groundwater if recycled water is used to irrigate golf courses, parks, or other landscaped areas.

Pharmaceuticals. There is general environmental and potential public health concern about the ubiquitous nature of these pharmaceutical compounds in the water environment, especially in water sources intended for drinking and culinary uses. The concern is much less in waters intended for non-potable uses, such as agricultural and landscape irrigation. This is because the level of exposure to recycled water is orders of magnitude less than in the case of drinking water, as shown in the following table MR3-1.

Table M.R.E-1. Estimated Exposure to Constituents in Water for Five Water Use Scenarios

Water Use Scenario	Estimated Exposure	Relative Intake (mg/kg-day)	Intake Relative to Drinking Water
Drinking Water (Child)	Total	0.06	1
Drinking Water (Adult)	Total	0.03	2xless
Recreational Swimmer (Child)	Total	0.0004	150x less
Recreational Child	Total	0.00007	800 x less
Industrial Worker	Total	0.00003	2,000 x less

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Source: Williams, Kennedy & Fuji, presented at WEFTEC, Denver 2005

Research is ongoing on the subject at several academic institutions and the published results are being monitored by the City staff. The Santa Rosa Board of Public Utilities recently received updates on the state of the science and the risks presented by recycled water use for irrigation and recreational exposure^{viii}. Table MR3-2 below, illustrates data compiled from various sources related to the presence of a range of pharmaceuticals in recycled water. Table MR3-3 illustrates the cumulative lifetime doses that an agricultural worker, a playground user and a recreational swimmer could expect when exposed to these pharmaceuticals via recycled water. In general, the lifetime exposure through recycled water is much lower than a single therapeutic does of the pharmaceutical in question.

Pharmaceutical	Category	Recycled Water Treatment Level	Range (ng/l)	Mean (ng/l)
Ibuprofen (Advil)	NSAID	Tertiary	<10-37	13
Naproxen (Aleve)	NSAID	Tertiary	<10-300	71
Acetaminophen (Tylenol)	Analgesic/antipyretic	Unknown	<9-43	9.3
Metoprolol (Lopressor)	Beta-blocker	Tertiary	<10-130	35
Ciprofloxacin (Cipro)	Antibiotic	Tertiary	<30-180	87
Ethinylestrodial	Hormone	Tertiary	<0.1-0.49	0.33

Source: Kennedy 2007

Pharmaceutical	Single Therapeutic Dose (mg)	Recycled Water Exposure		
		Cumulative Agricultural Worker Dose (mg)	Cumulative Playground User Dose (mg)	Cumulative Recreational Swimmer Dose (mg)
Ibuprofen (Advil)	200	0.010	0.0003	0.002
Naproxen (Aleve)	200	0.030	0.001	0.007
Acetaminophen (Tylenol)	650	0.00007	0.0002	0.0001
Metoprolol (Lopressor)	50	0.0010	0.00009	0.0006
Ciprofloxacin (Cipro)	100	0.00004	0.0001	0.0009
Ethinylestrodial	0.02	0.0001	0.000005	0.00003

Source: Kennedy 2007

Phthalates. The ubiquity of phthalates in the environment is well documented in the scientific literature (see Table MR4-1), and is a function of widespread use of plasticizers in manufacturing processes of many of the household products routinely sold to the public world-wide. The continuous stream of new products manufactured and distributed to

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consumers has tended to maintain certain levels of phthalate esters reported in food, water and air over the past several decades. Bis (2-ethylhexyl) phthalate (DEHP) is consistently found in laboratory blanks (“pure” water) at levels up to 5 ng/L and bottled water has been measured to contain phthalates at concentrations up to 26 µg/L^{ix}.

Therefore, occurrence of phthalates in recycled water at similar levels to those in drinking water supplies is not surprising. Since recycled water is not intended for drinking, its potential as a source of phthalate uptake by humans is far less than that posed by the air we breathe, the food we eat and the variety of drinks we consume—including potable water.

In a Japanese study^x, samples of river water, tap water, well water, and mineral water from a variety of sources were analyzed for five phthalate esters. The results are shown in Table MR4-1 indicating the presence of di (2-ethylhexyl) phthalate (DEHP) and Di-*n*-butyl phthalate (DBP) in nearly all samples and much lower concentrations (or no detect) for the other phthalate esters.

In a study of a variety of water samples in Zagreb, Croatia, “[t]he presence of one or more phthalates was demonstrated in 93 out of 96 (97%) water samples. The measured values ranged from 0.005 to 18.157 µg/L. Phthalates were detected in 76 out of 77 (98%) underground water samples. The mean level of all phthalates present in the water samples was 4.879 µg/L.”^{xi} The World Health Organization (WHO) guideline for di(2-ethylhexyl) phthalate in drinking water, based on a series of conservative assumptions, is 8 µg/L^{xii}.

Average daily intake of di(2-ethylhexyl) phthalate from air, food, and water has been calculated to be about 0.001 mg/kg-day^{xiii}. By contrast, recycled water applied to the soil for irrigation does not come into contact with humans under normal conditions and in general does not contribute to this daily intake. Therefore, presence of phthalates in recycled water poses a far lower risk—if any—than its presence in other environmental media. Any alternative source of irrigation water—river, tap, well—would most likely contain similar concentrations of phthalates.

Table M.R.E-4. Concentration of Phthalate Esters in Selected Water Samples in Japan

Sample Site	Sampling Date	Concentration, µg/L				
		DMP	DEP	DIBP	DBP	DEHP
Temaku River:						
Otokiki Bridge	July 1998	ND	ND	ND	3.34	0.97
Otokiki Bridge	Nov 1999	ND	ND	ND	0.29	ND
Chidori Bridge	July 1998	ND	0.03	ND	3.9	1.83
Chidori Bridge	Nov 1999	ND	ND	ND	0.55	ND
Kiso River	Feb 2000	ND	ND	ND	0.51	0.99
Kumozu River:						
Point-1	Aug 1999	ND	ND	ND	1.85	ND
Point-2	Aug 2000	ND	ND	ND	2.33	0.79
Point-3	Aug 2001	ND	ND	ND	2.59	0.66
Point-4	Aug 2002	ND	ND	ND	3.32	0.43

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Well Water:						
University	Nov 1998	ND	0.8	0.11	2.29	0.78
Tap Water:						
House	Nov 1998	ND	ND	ND	1.53	3.63
University	Oct 1998	0.08	0.02	ND	1.68	5.22
University	Nov 1998	ND	0.05	ND	4.03	0.19
University	Dec 1998	ND	ND	ND	0.91	0.94
University	Apr 1999	ND	ND	ND	9.26	1.64
University	Apr 1999	ND	ND	ND	2.41	ND
University	Feb 2000	ND	ND	ND	0.57	0.62
Mineral Water I		ND	ND	ND	0.21	ND
Mineral Water II		ND	ND	ND	0.19	ND
Mineral Water III		ND	ND	ND	0.52	0.42

Note: DMP = Dimethyl phthalate; DEP = Diethyl phthalate, DIBP = Di-isobutyl phthalate, DBP = Di-*n*-butyl phthalate, and DEHP = Di-(2-ethylhexyl) phthalate.

SOURCE: Hashizume *et al*^{xiv}.

The City of Santa Rosa, in the EIR for its Incremental Recycled Water Program (IRWP) conducted a human health risk assessment that included recycled water used for irrigation.^{xv} As part of this work, recycled water from Santa Rosa's Laguna Treatment Plant was sampled for a range of chemicals including di-*n*-butyl phthalate, bis (2-ethylhexyl) phthalate and diethyl phthalate. The results are illustrated in Table MR4-2 below. Based on these concentrations, the sensitive receptors, the potential exposure paths, and the mitigation provided by the California Water Recycling Criteria, the assessment concluded that there were no significant human health impacts from exposure to recycled water used for irrigation.

Chemical	1996 Data for Fresh Effluent			2002 Data for Fresh Effluent		
	Maximum Concentration (mg/l)	Mean Concentration (mg/l)	Detects/ Total No. Samples	Maximum Concentration (mg/l)	Mean Concentration (mg/l)	Detects/ Total No. Samples
di- <i>n</i> -butyl phthalate	0.0019	0.0012	2/19	ND	ND	0/18
Bis (2-ethylhexyl) phthalate	0.0060	0.0028	5/19	ND	ND	0/18
Diethyl phthalate	0.0070	0.0009	2/19	ND	ND	0/18

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MASTER RESPONSE F: Transportation

Trip Reduction Ordinance Commenters noted that the Trip Reduction Ordinance is voluntary and therefore will be ineffective in mitigating project impacts. The DEIR does not indicate the trip reduction ordinance will mitigate impacts to less than significant levels. While the General Plan proposes the Trip Reduction Ordinance as a potential mitigation to benefit intersections that will operate at unacceptable LOS E, identified on page 3.2-34, those impacts were identified as significant and unavoidable impacts (since identified mitigation measures at those locations would conflict with other General Plan goals, and since the Trip Reduction Ordinance is not enforceable, given the voluntary nature of the trip reduction ordinance).

While adoption of the Trip Reduction Ordinance is identified as a potential mitigation to help decrease levels of traffic, through voluntary participation, the Ordinance itself is not required to mitigate the conditions to “less than significant” levels at any of the failing intersections, since those intersections have been identified as having significant and unavoidable impacts.

Furthermore, for analysis purposes, the estimated traffic reduction associated with Trip Reduction Ordinance was not quantified. The Trip Reduction Ordinance is identified as mitigation within the General Plan because similar ordinances have proven beneficial in other jurisdictions within the Bay Area to reduce traffic, especially during the peak hours. Commenters are correct in noting this is not an enforceable mitigation and so therefore is not relied on to fully mitigate any impacts resulting from the Proposed General Plan.

Transportation Implementation & Funding The traffic and land use development between the Existing (Year 2007) Conditions and the Future with Project (Year 2025) conditions can be compared to estimate the amount of traffic, and corresponding roadway improvements, that would be associated with the planned General Plan land use development. As part of its development of an appropriate traffic mitigation fee the City has prepared a City of Petaluma Traffic Mitigation Fee Program Update (Fehr & Peers, October, 2007) which analyzes the levels of development permitted under the General Plan 2025, the cost of traffic improvements relied on to mitigate various traffic impacts of that development, and traffic impact fees sufficient to fund the needed improvements. On December 3, 2007, the City Council adopted Resolution 2007-202, which provided notice of the City’s intent to amend its traffic impact fee upon General Plan adoption in an amount sufficient to fund the improvements relied on as mitigation, in amounts supported by the Fehr & Peers traffic fee study. The traffic impact fees will be adopted after General Plan adoption and will be paid at the time development occurs, to offset the cost of the General Plan roadway improvements. Assessment of a fee is an appropriate form of mitigation when it is, as here, linked to a specific mitigation program and is part of a reasonable plan of actual mitigation that the City commits itself to implementing. The City will identify the sequence in which the roadway improvement projects are constructed based on community need and funding. Construction of the roadway improvement projects listed in the General Plan is achievable

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with the proper traffic mitigation fee program, which would provide funding for the improvements. The General Plan roadway improvements currently represent the most feasible and beneficial projects that could provide safe and efficient travel under the Future with Project (Year 2025) Conditions.

The City reserves the right to identify the order that the roadway improvement projects are constructed based on community need. Mitigation 5-P-2 has been revised.

✓

Mitigation 5-P-2 is revised to read as follows:

Ensure the identified mobility system is provided in a timely manner to meet the needs of the community by updating the City's transportation impact fee program to insure that necessary citywide improvements are funded.

- A. Transportation impact fees will be determined based on each project's fair share of the aggregate costs of roadway improvements identified within the Mobility Element and EIR.
- B. The fee program is intended to ensure that new developments pay its proportionate share of traffic infrastructure improvements to mitigate direct traffic impacts from new development.
- C. Some portion(s) of the identified mobility system improvements may be constructed as part of project related improvements through the entitlement process.
- D. Allocation of mitigation funds shall be designated to the capital improvement project for which it was exacted.

Significant and Unavoidable Impacts at Study Intersections Several commenters noted that while significant impacts were identified at six study intersections, the DEIR made no attempt to identify or describe potential mitigation at those locations. Instead the DIER stated that "installing additional lanes or expanding capacity at these locations would conflict with proposed General Plan goals and policies related to improving multi-modal circulation and preserving the pedestrian environment of Central Petaluma. Therefore, no mitigations are identified. Intersection impacts at these locations are significant and unavoidable:

- McDowell Boulevard North / Corona Road
- Lakeville Street/Caulfield Lane
- Lakeville Street / East D Street
- Petaluma Boulevard South / D Street
- Sonoma Mountain Parkway / Ely Boulevard / East Washington Street
- McDowell Boulevard North / Rainier Avenue

Several commenters stated the opinion that (1) the DEIR explanation for finding mitigations to be infeasible is inadequate, and (2) that CEQA requires identification of the infeasible mitigations in declaring impacts to be significant and unavoidable.

CEQA permits the lead agency (in this case, the City of Petaluma) to determine that project impacts are significant and unmitigated and still proceed with a project upon adoption of a Statement of Overriding Considerations (CEQA Guidelines §§ 15091(a)(3); 15093). The

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Guidelines note that “if the benefits of a proposed project outweigh the unavoidable adverse environmental affects, the adverse environmental affects may be considered acceptable”. (CEQA Guidelines § 15093(a).

In this case, the development of potential mitigations at the intersection locations rests with the City’s desire to avoid widening intersections, which would conflict with the Guiding Principles identified in the General Plan, particularly those that call for preservation of historic character and the provision of multi-modal circulation options. In order to codify this policy with regard to automobile level of service (LOS), Policy 5-P-10 of the General Plan has been revised.

✓ Policy 5-P-10 of the General Plan has been revised to state the following:

Policy 5-P-10: Maintain an intersection level of service (LOS) standard for motor vehicle circulation that ensures efficient traffic flow and supports multi-modal mobility goals. LOS should be maintained at Level D or better due to traffic from any development

A. A lower Level of Service may be deemed acceptable, by the City, in instances where the City finds that potential vehicular traffic mitigations (such as adding additional lanes or modifying signal timing) would conflict with the Guiding Principles of the General Plan, particularly with regard to:

- *Guiding Principal #2. Preserve and enhance Petaluma’s historic character.*
- *Guiding Principal #6. Provide a range of attractive and viable transportation alternatives, such as bicycle, pedestrian, rail and transit.*
- *Guiding Principal #7. Enhance Downtown by preserving its historic character, increasing accessibility, and ensuring a broad range of business and activities and increasing residential activities.*

The above does not relieve any need to mitigate development related impacts, which may include multi-modal improvements to reduce identified impacts.

1 **Comment:** Please provide population projection by age and stratification in order to better understand the number of retirement-aged citizens as compared to students.

Response: The Association of Bay Area Governments’ “Projections 2007” provides population projections by age and sex at the county level. The projections show an increase over time in the median age of Sonoma County residents. The following table illustrates projected median age over time:

YEAR	MEDIAN AGE
2000	37.5
2005	39.3
2010	40.7
2015	41.1
2020	41.3
2025	42.2
2030	43.4

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- 2** **Comment:** Further explanation of “No Project” having more impact than the new General Plan, specific examples.
Response: See Master Response A.

✓ Page 2-20: Correction of narrative to reflect percentage of growth over the next 20 years from 26% to 27%.
- 3** **Comment:** Finding information on Alternatives 2 and 3?
Response: See Master Response A.

✓ Page iii: Table of Contents expanded to add ECOC and Alternatives Report
- 4** **Comment:** Directed Planning Commission to look at every Element.
Response: Opinion on the need to educate the Commission is noted; the Planning Commission reviewed each and every element encouraging public participation and input during workshops and noticed hearings.
- 5 A** **Comment:** Concern that Mannion Knoll Park is listed as an existing park.
Response: Mannion Knoll Park was built prior to the publication of the DEIR and is so noted.
- 5 B & C** **Comment:** Level of Service of Rainier Avenue cross-town connector and ‘voluntary’ enforcement of Trip Reduction Ordinance.
Response: The commenter’s concerns have been noted for the record. See Master Response F.
- 5 D** **Comment:** How could City optimize use of SCWA water?
Response: The City has proposed to optimize the use of Sonoma County Water Agency water in compliance with existing Agreements and the development of a recycled water system to offset use of potable water for non-potable uses. In addition, the development and implementation of an extensive Water Conservation Plan, adopted in January 2008, will ensure the ongoing optimization and monitoring of the SCWA domestic water supply. Please see Water Resources Element, Section 8.1, Goals 8-G-1 through 8-G-6, and associated Policies and Programs contained in the General Plan.
- 5 E** **Comment:** Support for continuation of zero net fill and zero net run-off requirements.
Response: Comment Noted.
- 6** **Comment:** Kelly Creek maintenance – what does the City owe the current residents before development is allowed?
Response: The Kelly Creek corridor is privately owned and, for the majority of its length, is privately maintained. Since the public comments received on the issue of Kelly Creek maintenance, Department of Water Resources and Conservation staff has initiated communication with the property owners affected to assist in the coordination and timing of routine maintenance prior to commencement of the annual storm season. Development within the Kelly Creek watershed, similar to any watershed, should identify and mitigate any off-site impacts to the creek capacity, habitat, and water quality. Please see Water

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- Resources Element, Goals 8-G-9, Policy 8-P-36, Program G: “The City shall facilitate and advise property owners to ensure the maintenance of privately owned creeks and channels (e.g. Kelly Creek). Assistance may include facilitation of regulatory permitting and design standards.”
- 7 A** **Comment:** Deer Creek surface water issues; traffic impacts.
Response: Project specific comments relating to the DSL property on N. McDowell at Rainier proposed by owner to be regional serving commercial; comment noted. General Plan identifies the site as Mixed Use. Policies provide for the preservation and enhancement of existing natural habitat. Surface water issues associated with a future development proposal will be subject to compliance with applicable policies and programs to minimize onsite and offsite impacts.
- 7 B** **Comment:** Rainier Avenue cross-town connector and interchange EIR and biological reports relating to DSL project.
Response: Project specific comments relating to the DSL property on N. McDowell at Rainier proposed by owner to be regional serving commercial; comment noted. General Plan identifies the site as Mixed Use; see Response 7A.
- 8 A** **Comment:** Intense commercial effects on ambulance, pedestrian, bicycle and people using wheelchairs and walkers.
Response: Project specific comments relating to the DSL property on N. McDowell at Rainier proposed by owner to be regional serving commercial; comment noted. General Plan identifies the site as Mixed Use; see Response 7A.
- 8 B** **Comment:** Project related impacts to flooding, large trucks, wildlife habitat, surface traffic transferring to local streets, air quality, causing a decrease in property values.
Response: Project specific comments relating to the DSL property on N. McDowell at Rainier proposed by owner to be regional serving commercial; comment noted. General Plan identifies the site as Mixed Use; see Response 7A.
- 9** **Comment:** Traffic impacts associated with proposed commercial project.
Response: Project specific comments relating to the DSL property on N. McDowell at Rainier proposed by owner to be regional serving commercial; comment noted. General Plan identifies the site as Mixed Use; see Response 7A.
- 10** **Comment:** Project related traffic impacts.
Response: Project specific comment relating to the Delco property on Corona Road proposed by owner as Low Density Residential; later withdrawn. General Plan identifies the properties as split between Very Low Density Residential (0.6 to 2.5 dwelling units/acre) and Low Density Residential (2.6 to 8.0 dwelling units per acre).
- 11** **Comment:** Flood impacts associated with proposed residential project.
Response: Project specific comment relating to the Delco property on Corona Road proposed by owner as Low Density Residential; later withdrawn. General Plan identifies the properties as split between Very Low Density Residential (0.6 to 2.5 dwelling units/acre) and Low Density Residential (2.6 to 8.0 dwelling units per acre).

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- 12 **Comment:** Utility impacts, reduction of density, seasonal wetlands, traffic and access, roadway improvements relating to proposed residential project.
Response: Project specific comment relating to the Delco property on Corona Road proposed by owner as Low Density Residential; later withdrawn. General Plan identifies the properties as split between Very Low Density Residential (0.6 to 2.5 dwelling units/acre) and Low Density Residential (2.6 to 8.0 dwelling units per acre).
- 13 **Comment:** Flooding, water table, road impacts of proposed residential development.
Response: Project specific comment relating to the Delco property on Corona Road proposed by owner as Low Density Residential; later withdrawn. General Plan identifies the properties as split between Very Low Density Residential (0.6 to 2.5 dwelling units/acre) and Low Density Residential (2.6 to 8.0 dwelling units per acre).
- 14 **Comment:** Water quality of recycled water, removal of contaminants, safety concern.
Response: The City of Petaluma's Water Recycling Facility (WRF) was designed to the current best technology available for the production of recycled water. All recycled water use will conform to the current Title 22 of the Health and Safety Code under permit by the State. See Program 8-P-9.B. See Master Response E.
- 15 **Comment:** Impacts to aquifer and concern of Penngrove residents.
Response: Groundwater levels in the Penngrove area are affected by the balance between recharge, discharge and underflow into and out of the local groundwater system. Penngrove is located in the upper Petaluma River watershed, and probably receives most of its groundwater recharge from direct precipitation and percolation through the channels of Lichau Creek, Willow Brook and Davis Creek. Recharge is probably limited because of the relatively small watersheds of these creeks. Discharge occurs through pumping for supply in the local area. Natural groundwater discharge in the Penngrove area may occur seasonally to the lower reaches of the creeks and through seasonal evapotranspiration by plants. California Department of Water Resources (DWR) Bulletin 118 Update 2003: California's Groundwater, locates the Penngrove area over a divide separating the Santa Rosa Plain Groundwater Subbasin 9 (Basin 1-55.01) and the Petaluma Groundwater Basin (Basin 2-1). The Petaluma Formation is the primary geologic unit comprising the aquifer beneath the area. The Petaluma Formation extends to the north, forming much of the aquifer system beneath the Santa Rosa Plain, and to the south, where it makes up a significant portion of the aquifer system beneath the Petaluma Valley. Because of the continuity of the Petaluma Formation, groundwater underflow is possible between the Penngrove area and the Santa Rosa Plain Groundwater Subbasin and the Petaluma area. However, rates of groundwater underflow between these three areas are probably low because of the low permeability of the Petaluma Formation. Using Darcy's Law, a hydraulic conductivity of 1.4 feet per day estimated from the City of Petaluma's Stony Brook well, and an assumed groundwater gradient of 0.001, yields a low Darcy velocity of 0.001 feet per day. The rates of underflow between the Penngrove area and the Petaluma Valley are probably further limited by the Meacham and Tolay faults and the Adobe Creek anticline. These geologic structures are

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located between the Penngrove area and the Petaluma Valley and may impede groundwater flow.

Given these factors it is likely that underflow rates between the Penngrove area and the Petaluma Valley are low and groundwater elevations in the Penngrove area are controlled primarily by the balance between localized recharge and groundwater pumping in the Penngrove area. This conclusion is reinforced by the fact that the low permeability of the Petaluma Formation limits the yields of the City of Petaluma production wells and the lateral extent of their drawdown cones. Most of the City of Petaluma's production wells are located thousands of feet from the Penngrove area in areas receiving recharge from Lynch, East Washington, Washington, and Adobe Creeks, none of which would be likely to result in recharge in the Penngrove area in the absence of groundwater pumping by the City of Petaluma. For these reasons, none of the City of Petaluma production wells are likely to have a significant drawdown effect on the Penngrove area, even if operated at maximum long-term capacity. It is also important to note that the water supply program analyzed in the DEIR does not envision operation of city wells at maximum capacity or anything but very limited pumping in emergencies. The City's recently adopted Water Conservation Program added to the recycled water supply program identified in General Plan 2025 make even that use of groundwater from city wells unlikely. Please see Reference E.3, 2.5, 3.5, 3.6, Volume 4, Appendix F-2, Groundwater Feasibility Study (February 2004).

16

Comment: City needs a drought emergency plan.

Response: The City has adopted a drought emergency plan within the City Urban Water Management Plan (2005).

17

Comment: Concerned with flood boundary map and model runs illustrating floodplain boundary out of Corona Creek corridor; improvements undertaken with the Traditions residential subdivision.

Response: Staff has reviewed the input data for the modeling and identified the existence of three 72" diameter culverts under the railroad grade; the final model run is illustrated on Exhibits and 3.6-3F and 3.6-4F.

18 A

Comment: Flooding problems associated with development upstream of Marin Creek.

Response: The detention pond designed and constructed for West Haven controls off-site flows to not exceed pre-development conditions. The SCWA is proposing a vegetation management and restoration project on Marin Creek. Department of Water Resources and Conservation staff will continue to work cooperatively with SCWA to share watershed model data (see Policy 8-P-30, Program A).

18 B

Comment: Standards that prevent terracing and removal of vegetation; and concern with illegal fill.

Response: See response 18A regarding removal of vegetation; City has no authority on illegal fill placed within the County jurisdictional area. See Policy 8-P-32, Program A and Policy 8-P-34, Programs A & B regarding City's support for a regional solution to addressing placement of fill within the regulatory floodplain or flood prone areas.

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- 19 A** **Comment:** Global climate change and effect on public facilities.
Response: The impacts associated with Greenhouse Gas Emissions are addressed in the Revised Draft EIR, Vol. 5.A, Appendix G.1, "Greenhouse Gas Emissions" (November 2007); public facilities are specifically addressed. For comments on impacts to tide elevations relating to global climate change impacts, see Response 68 C and Master Response B. For additional identification of General Plan policies which serve as mitigation, see Responses 168 and 169.
- 19 B** **Comment:** Emergency Cell Phone Access.
Response: The City of Petaluma completed the conversion of 911 calls placed within Petaluma to be routed to the Petaluma Police Department rather than CHP dispatch in the East Bay. No additional analysis or policy is provided in the General Plan.
- 20 A** **Comment:** Safety of tertiary treated water on playing fields.
Response: The use of tertiary treated recycled water for irrigation of playing fields is governed by California Health and Safety Code, Water Code and Titles 17 and 22 of the California Code of Regulations. The Ellis Creek Water Recycling Facility will produce tertiary recycled water that meets the Title 22 requirements for unrestricted use and is safe for playing field irrigation.
Recycled water will be applied at rates meeting irrigation requirements. The rate at which recycled water will be applied will be matched to the consumptive needs of each area to be irrigated, as dictated by the evapotranspiration of the applied water by the turf or landscaping present. These rates will vary by area, depending on the particular mix of vegetation, and, seasonally, because evapotranspiration rates vary throughout the year. Evapotranspiration rates are lowest in the late fall, winter and early spring, and highest in the late spring, summer and early fall. Reference DEIR Section E.3, 2.5, 3.5, 3.6, Volume 2 Appendix C, Water Supply and Demand Analysis Report (June 2006). See Policy 8-P-9. See Master Response E.
- 20 B** **Comment:** Potential groundwater recharge area protection; how achieved.
Response: Groundwater recharge from irrigation use of tertiary treated recycled water will be minimal because the use of tertiary treated recycled water will be matched to irrigation needs. Also, areas where recycled water will be used are not located in potential groundwater recharge areas. Most areas in the Petaluma Valley have low groundwater recharge potential due to the presence of low permeability soils, excessive slopes, or a combination of these factors. Areas of somewhat higher recharge potential are located in the northwest of the City of Petaluma, in terrain underlain by the Wilson Grove Formation, and along the foothills of Sonoma Mountain, east of the City. The use of tertiary treated recycled water is not planned in these potential recharge areas. Refer to Volume 4, Appendix F-2, Groundwater Feasibility Study (February 2004).
- 21** **Comment:** Incorporation of River Access and Enhancement Plan; separate River Element.
Response: The Petaluma River corridor is recognized as one of the primary natural environmental assets of the community; thus, it is addressed within the Natural Environment Element. The River Access and Enhancement Plan has been incorporated

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- into the General Plan (see text in Section 4.1, Natural Environment Element: “The General Plan incorporates the River Plan as a proven effective tool for use by the City and property owners alike in achieving the goals set forth by the community.” and by Program 4-P-1 A. “Implement the Petaluma River Access and Enhancement Plan including expanded improvements identified through project specific environmental assessment.”
- 22 **Comment:** Unmitigated Levels of Service for seven intersections; seventh intersection was dropped because its LOS exists on a feeder street, Lindberg Lane...
- Response:** Under the General Plan, unsignalized intersections that exceed the LOS standard are not considered significant impacts unless the side-street volume is such that it meets peak hour signal warrants, which would require signalization of the intersection. In such a case, the most likely mitigation would be to install a traffic signal. However, such mitigation is not feasible if traffic volumes are too low to warrant a signal.
- The Lakeville Street/Lindberg Lane intersection is not a signalized intersection. As detailed in the DEIR, the existing and forecasted peak hour side-street volumes do not exceed 100 peak hour trips, which is the peak-hour volume threshold required to warrant signalization. Therefore the intersection will not exceed the LOS standard and impacts at this intersection are less than significant.
- 23 **Comment:** Assumption that community’s LOS is based on construction of the cross-town connector and other improvements; source of funding.
- Response:** See Master Response F.
- 24 **Comment:** A series of planned roadway improvements appeared to assume mitigations to improve traffic and asked how achievable this was given the need to qualify the mitigations to make it work.
- Response:** See Master Response F.
- 25 **Comment:** Roadway improvements would be difficult to achieve; if improvements not done, what would be the effect; completeness of DEIR without this information.
- Response:** See Master Response F
- 26 **Comment:** Could a project be built that supersedes the GP, does the EIR address this.
- Response:** City Council authorization of funding and direction to proceed with the environmental review, design and construction of a major capital improvement project, such as a roadway, sewer plant, park, community facility, includes a finding that the project is consistent with the current General Plan at the time of the project proposal. Funding is identified either through the Implementation Plan of the General Plan or through the authorization of a Capital Improvement Project budget for the specific project.
- 27 **Comment:** A Planning Commissioner stated a desire to include a statement in the General Plan that the ability to complete all of the projects in the Plan may not be attainable.
- Response:** The purpose of the General Plan is to define a comprehensive long-term plan for physical development of the City, and a means to implement that plan. The prioritization of public improvement projects relied on for implementation is then carried out through yearly and 5-year Capital Improvement Plans which are authorized by the

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- 28 **Comment:** Quantification of groundwater recharge and reliability of numbers to judge how much pumping could take place at a sustainable rate.
- Response:** The General Plan does not include a provision to increase the use of groundwater for potable supply. Technical Appendix F-2 identifies the groundwater production and well yields. In addition to the recognition that no increase of well use for meeting potable demands will occur during the buildout period of this General Plan, enhancement of recharge potential is addressed through the identification of greater setbacks along the River corridor within areas of the floodplain which sustain flood depths in excess of 1' will allow greater periods of inundation along the river corridor, thereby enhancing percolation and absorption capabilities during the wet season. A production rate of 2,000 to 3,000 acre feet appears to be a reasonable assumption for the city's maximum developable groundwater capacity, given the known constraints on water quality and the potential risks associated with excessive drawdown and saltwater intrusion (see Page 34 of Technical Appendix F-2).
- 29 **Comment:** Using the 100-year flood event as the basis for measurement versus a 300-year flood event.
- Response:** The 100-year event standard is used, in compliance with FEMA and NFIP standards, for floodplain regulation, design of flood control measures, and riverine project design by state and federal agencies. The 100-year discharge is the discharge that has a 1% chance of being exceeded in any given year, and the magnitude of the estimate varies by location. The first step towards improving our understanding of the frequency and severity of flooding in the City is to improve the estimate of the 100-year discharge.
- Mitigation:** There are three mitigations to improve the 100-year discharge estimate: Expand to add mitigation measures 3.6(d.1 through d.3):
- 1) Add ten stream level gages by the year 2010 at the following locations:
 - a. Petaluma River at Petaluma Blvd (southbound bridge)
 - b. Petaluma River at the railroad trestle bridge downstream of Corona Creek
 - c. Corona Creek at McDowell Blvd.
 - d. Capri Creek at McDowell Blvd.
 - e. Adobe Creek at Lakeville Road
 - f. Lynch Creek at Maria Dr.
 - g. Lynch Creek at McDowell Blvd. or HWY 101 (northbound)
 - h. Washington Creek at McDowell Blvd. or HWY 101 (northbound)
 - i. East Washington Creek at Washington St.

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- j. Petaluma River at HWY 101 (southbound bridge)
- 2) Obtain instantaneous velocity measurements during storm events at all stream gages in the City, including those proposed in mitigation #1 above. The velocity measurements should be collected during significant rainfall events over the next two to three years. The duration of the metering period could be expanded if significant events do not occur by the year 2010.
- 3) Continue to develop the XP-SWMM model as new calibration data resulting from the above mitigations becomes available. As the model calibration is refined, the 100-year discharge estimate will become refined.
- ✓ **DEIR Page 3.6-13, addition of Mitigation Measures 3.6 (d.1 through d.3), identified above.**
- 30** **Comment:** Funding of future improvements; how is development planned around these improvements.
Response: Development which creates the need for improvements will not receive entitlement without the participation in proportionate fair share of necessary improvements and timing of city-wide improvements are set forth in yearly and 5-year Capital Improvement Programs. The General Plan 2025 Implementation Plan has been prepared to ensure timely completion of General Plan related improvements and provides an outline for timing, funding opportunities and options to ensure improvements meet community needs.
- 31** **Comment:** Concern with berm heights within Denman Reach; berms needed to be higher and stronger.
Response: The comment was made in response to staff discussion with the Planning Commission on the planned improvements to the Willowbrook Creek berm on Denman Road adjacent to Leisure Lake. The berm was raised and reinforced.
- 32 A** **Comment:** Potential for development to overload storm drains; zero net fill mitigation.
Response: At time of development proposal, hydraulic analysis of existing surface water containment systems is required, and if necessary, the cost of upsizing is conditioned on the development. The conveyance capacity of the open drainage containment system has been evaluated for the purpose of completing the General Plan 2025 and EIR documents and appropriate policies and programs are contained to ensure the preservation and maintenance of that capacity. See Goals 8-G-8 and 8-G-9 and applicable policies and programs.
- 32 B** **Comment:** Permit process should include identification of where the fill is to be placed when excavated from the floodplain.
Response: Comment noted. See Program 8-P-36.I.
- 32 C** **Comment:** Future efforts to demolish housing within regulatory Floodway.
Response: Suggested expansion of Program 8-P-34 B has been included, in conjunction with other text amendment suggestions (see Response 93.F.1): “Working with Sonoma County, the City shall develop a plan and identify funding opportunities to acquire and move, relocate, or demolish housing, which remain located within the regulatory

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32 D		<p>floodway, once remapping occurs.”</p> <p>Comment: Seismic related ground shaking on hillsides.</p> <p>Response: The City is preparing an update to the Hillside regulations within the Development Code. Existing and future regulations address the need for soils analysis and engineering studies to ensure slope failures are avoided and buildings meet current Building Codes for seismic reinforcement.</p>
33		<p>Comment: Financial connectivity to define how utility connection fees relate to the installation of “purple” pipe to offset the use of potable water.</p> <p>Response: Implementation of the recycled water system public improvements, including "purple pipe" to the point of connection with individual projects will be funded through water capacity charges, which will be adjusted upon adoption of the General Plan 2025 to cover the costs of the public improvements needed for the recycled water program. On June 19, 2006, the City Council adopted Resolution 2006-120, a resolution of intent to amend water capacity charges to an amount sufficient to pay for the recycled water system public improvements and conservation programs expected to be a part of the General Plan 2025 water supply programs, based on the Water Capacity Charge Update Report (Bartle Wells Associates, 2006) which is incorporated into Resolution 2006-120. The increased capacity charges will be adopted upon adoption of General Plan 2025.</p>
34		<p>Comment: Raising the tertiary water standard to remove pharmaceuticals and other by-products.</p> <p>Response: See Master Response E.</p>
35		<p>Comment: Water conservation statement referencing development may trigger the need to expand the new water recycling facility for more tertiary water treatment.</p> <p>Response: The Water Demand and Supply Analysis Report, Technical Appendix Volume 2 outlines a comprehensive program of water supply utilizing existing SCWA allocation, implementation of the adopted Water Conservation Plan and the use of tertiary and secondary treated recycled water to meet demand to buildout.</p>
36 A		<p>Comment: Public Utilities and Energy portions include a provision requiring energy saving upgrades upon sale of property.</p> <p>Response: The City is pursuing voluntary programs for water conservation and sidewalk improvements. The City Council did not support mandatory programs at this time. To establish a due-on-sale energy conservation program would first require establishing some type of threshold of household energy conservation and a determination of what types of measures would be necessary to achieve that standard.</p>
36 B		<p>Comment: Solid Waste – include language stating waste contractor would provide a resource recovery area at dumpsite.</p> <p>Response: Presently nearly 50% of material delivered to the Redwood Landfill is diverted from disposal and reused on-site or sold to third parties for reuse or recycling. In correspondence, dated June 1, 2007 Waste Management indicated they are committed to supporting increased on-site and off-site recycling activities. Upon approval of its revised</p>

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- SWF permit, Redwood has committed to and is currently planning for a construction and demolition materials recovery facility. Redwood will also move forward on plans to convert landfill gas to energy.
- Additional Mitigation:** City contract negotiations for providing dump site services shall continue to include discussion on resource recovery services for Petaluma waste.
Addition of General Plan Policy 4-P-23 per mitigation measure above.
- 36 C** **Comment:** Phase out dumping at Redwood Landfill or any other environmentally sensitive sites.
Response: General Plan Policy 4-P-22 states “Require future waste contracts to ensure disposal of City waste products at a site with the least potential for environmental impacts.
Addition of General Plan Policy 4-P-22 per mitigation above.
- 37 A** **Comment:** How are casino impacts addressed?
Response: See Master Response D.
- 37 B** **Comment:** Storm drainage standards; difference between City and County.
Response: The City’s storm drainage standards were developed to address the specific drainage issues within the City’s jurisdiction. In addition, the City works closely with the Sonoma County Water Agency (SCWA) to address regional drainage issues in the upper Petaluma River watershed through implementation of the SCWA Master Drainage Plan. The City also contracts with the SCWA for review of Hydrology/hydraulics submittals on all new development.
- 37 C** **Comment:** Addressing SCWA comments on DEIR.
Response: Comments provided by SCWA and appropriate responses are identified as Comments number 96 A through N.
- 37 D** **Comment:** Letter from Plaza North Shopping Center owners regarding traffic impacts of the DSL properties.
Response: This comment was a Planning Commissioner inquiring whether a response would be undertaken on the correspondence received. The comments were made relative to a owner-requested General Plan land use designation request for the properties of DSL (Rainier Avenue at North McDowell Boulevard) to change the designation to Community Commercial; that request was not approved, the site remains designated Mixed Use.
- 37 E** **Comment:** Financing mechanisms for mitigations.
Response: The Notice of Intent, adopted by the City Council in 2007, provides a list of capital improvements tied to the mitigation measures set forth within the FEIR with information on funding sources and timing. The adoption of development impact fees, concurrently with the adoption of the General Plan, ensures implementation of projects in a timely manner to coincide with development, capacity, and increased demand for services.
On December 3, 2007, the City Council adopted Resolution 2007-202, which provided notice of the City’s intent to amend its development impact fee upon General Plan adoption in amounts sufficient to fund a list of capital improvements tied to the mitigation

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measures within the FEIR, with information on funding sources and timing. The resolution and the prospective new fees studied were supported by a City of Petaluma Mitigation Fee Report (Sinclair & Associates, October 30, 2007) and the Fehr & Peers Traffic Mitigation Fee Program Update, October, 2007. See also Master Response F regarding transportation improvements. The City's sewer connection and storm drain fees are currently under review for adequacy to support the levels of development and facilities envisioned in the General Plan. The adoption of water capacity, sewer connection, storm drain, traffic and other development impact fees upon the adoption of the General Plan ensures implementation of projects in a timely manner to coincide with development, capacity, and increased demand for services.

- 37 F** **Comment:** Sonoma County PRMD's comments regarding traffic and regional effects.
Response: See Comment and Responses 93 A-D.
- 37 G** **Comment:** So. Co. PRMD's comments on bicycle circulation and county-wide coordination.
Response: See Comment and Responses 93 E-F.
- 37 H** **Comment:** Identifying Lafferty Park as a City-owned Park; differentiating between Lafferty and Tolay Lake.
Response: Comment noted; General Plan text will be modified.
- 37 I** **Comment:** Legalities of greywater and their use, option to capture rainwater.
Response: The City does not prohibit the construction of greywater systems. Regulations require measures be put in place to protect the connection to the potable water supply, with routine inspection to protect public health and safety. Use of catch devices for capturing rainwater is not prohibited; concern has been expressed on the inclusion of mosquito prevention measures. General Plan text has been added to evaluate the feasibility of permitting greywater systems (see Section 8.1).
- 38** **Comment:** Soil conditions on specific parcels.
Response: The Soil Conservation Service soil survey provides regional information on soil conditions. Engineering studies required at time of development proposals include identification of soil characteristics that are conducive to the proposed development. The Development Code addresses sensitive sites regarding hillsides, landslide potential and geologic hazards.
- 39** **Comment:** Banning of gas-powered landscaping tools and promotion of electric-powered tools.
Response: The banning of gas-powered tools should be considered within the Community Climate Action Plan, to be developed by the City; see Program 4-P-28.
- 40 A** **Comment:** Trip Reduction Ordinance, how effective when voluntary.
Response: See Master Response F.
- 40 B** **Comment:** Zero net runoff.
Response: The City does not currently have a zero net runoff requirement; the Draft General Plan 2025 includes a policy requiring the analysis of need for projects over ¼ acre

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		in area to ensure a zero net increase of runoff to reduce or eliminate surface water pollutants. This addresses both runoff and system capacities, and water quality aspects of surface water runoff. See General Plan Policy 3-P-113.
	✓	Mitigation 3.6(b): Policy 3-P-113 moved to Water Resources Element; renumbered to 8-P-36.M.
40 C		Comment: Zone 2A issues Response: The City continues to work with SCWA to identify, prioritize, and fund watershed maintenance and improvement projects. The City is on record in support of the continued funding of Zone 2A through the passage of a tax measure, currently underway by SCWA. See Policy 8-P-36.A.
	✓	Amend DEIR page 3.6-11 to add Policy indicating support for the continuation of the Zone 2A parcel tax for funding regional surface water improvements: "Support continuation of Zone 2A Parcel Tax for funding regional surface water improvements."
40 D		Comment: Consideration of public opinion when considering mitigations. Response: Public opinion was included in the identification of impacts and the formulation of mitigations. Public workshops and hearings were held throughout the community visioning, formulation of alternatives, draft plan and final plan preparation efforts, see attached Exhibit providing a schedule of workshops and hearings (Section 6 of FEIR).
41		Comment: Financial ability to mitigate impacts; resolution of conflicts between City and County regarding flood control and Zero Net Runoff. Response: Refer to response 40.B. and 40.C. and Master Response B.
42 A		Comment: Flooding is a consequence of development; development should pay for itself. Response: Comment noted; the burden of providing flood reduction and surface water management mitigation improvements are proportionately spread to development to comply with nexus requirements of matching direct impacts to specific mitigations. Mitigations may include, but not be limited to, creation of riverine terracing, detention ponds, zero-net fill and runoff. Flooding is also a regional issue with increasing storm flows from outlying areas impacting the urbanized areas of Petaluma.
42 B		Comment: West modeling should show results from the February 1998 storm event. Response: The model was calibrated to an event more significant than the February 1998 flood event. The data (storm conditions, rainfall, channel conditions, etc.) available for the December 2005 event is much more detailed and relevant to the calibration effort than that available for the February 1998 event. The 2005 event is a better storm for calibrating the model because it tests the broader range of the conditions than earlier storms and more data is available for this event.
42 C		Comment: The Corps project was not designed to accommodate the extra flow from Willow Brook and the River. The Petaluma River Corridor is a development scheme to allow construction without showing the impact of sheet flows. Response: The Petaluma River Corridor concept provides an increase in channel capacity. The XP-SWMM model, which includes known areas of shallow flooding, has shown that

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- the increase of impervious surfaces expected in 2025 results in a flood boundary width less than a pencil width larger than the existing flood boundary. This "pencil width" increase throughout the City has a total area of approximately 1.8 acres.
- The impact of sheet flows has been accounted for in the model as part of the cumulative impact analysis. When the water surface elevation for any creek in the model exceeds the bank elevation and flows in another direction as sheet flow, elements have been added to the model to route, or track, that breakout flow to its ultimate destination (e.g. another creek, ditch, storage area, etc.) or to a point where the depth of flow is less than one foot. In addition, see Response 40.B. regarding zero net runoff and proposed policies.
- 42 D** **Comment:** Pumpkin Patch property as a storm water holding area is inadequate; won't provide for new development, barely keeps up with current development.
- Response:** The Pumpkin Patch property located on the northeast side of Stony Point Road just west of Denman Road is designated in the General Plan as Agricultural – minimum development potential; historic flow patterns and retention capabilities are expected, and assumed, to remain.
- 42 E** **Comment:** Risk factor and personal responsibility of elected officials.
- Response:** Comment noted.
- 43 A** **Comment:** Concerns with LOS at 16 intersections.
- Response:** The LOS at the subject intersections have been quantified and analyzed. Mitigations have been incorporated to the extent possible, given the community's decision to not over-build roadways to meet peak hour demand. The cumulative traffic impact is recognized through the Statement of Over-Riding Consideration.
- 43 B** **Comment:** Concern with Global Warming not being addressed.
- Response:** See Master Response C on Greenhouse Gas Emissions.
- 44 A** **Comment:** Need for housing for low-income and disabled populations.
- Response:** The City of Petaluma Affordable Housing Program provides funding for the entire continuum of affordable housing needs from homelessness to seniors to first time homebuyers, working in partnership with nonprofit housing providers. One City Council priority is to assist persons with a physical and/or mental disability and funding has been provided for the development of affordable communities for persons with a specific disability (e.g. Salishan Apts. serving persons with a developmental disability and Boulevard Apts. serving tenants with a mental disability). Additionally, all City-assisted complexes include units which are adaptable or accessible to persons with a physical/mobility disability.
- 44 B** **Comment:** Finite water supply, who decides what percentage of growth is necessary.
- Response:** The community itself, through participation in the visioning work undertaken in 2001 and 2002, the public workshops held on the Existing Conditions, Opportunities & Challenges Report held in 2003, the workshops on the Land Use & Mobility Alternatives Report held in 2004 and 2005, which were all folded into the work effort to create the Draft General Plan and Draft EIR. Prioritization of growth and the granting of rights to

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44 C		the finite water supply is considered through the project review and entitlement process with ultimate approval resting with the City Council. Also, see Master Response A. Comment: If current residents are not provided for, they won't be able to afford to stay.
		Response: Comment noted.
45		Comment: Stop all development in the floodplain, water supply issues.
		Response: Comment noted.
46		Comment: Submitted written comments to be incorporated into Draft General Plan; comments on River Access and Enhancement Plan relating to DEIR; see Comment 70 A-O.
		Response: Comment noted; see response 70 A-O.
47		Comment: Floods and terracing impacts; dirt fill and zero net fill regulations.
		Response: Refer to Response 42 A.
48 A		Comment: Process has not followed CEQA; wants timetable for future hearings.
		Response: The CEQA Guidelines and the City of Petaluma Environmental Guidelines were followed as to both process and substance. The full extent of public input in to the General Plan process can be seen from the attached Exhibit (Section 6) listing all public meetings, workshops and hearings to date. All hearings have been noticed, and timetables for future hearings provided, and updated as needed. The commenter's suggestion that General Plan and EIR hearings must be separate is not in conformance with CEQA. 14 California code of Regulations ("CEQA Guidelines") section 15087(b), like Public Resources Code §21092(e) from which it is derived, explicitly says, "...[N]or shall the requirements of this section preclude a public agency from providing the public notice required by this section at the same time and in the same manner as public notice otherwise required by law for the project." The project in this case is the General Plan. Guidelines §15080 states "To the extent possible, the EIR process should be combined with the existing planning, review, and project approval process used by each public agency." This carries out legislative intent expressed in Public Resources Code §21003(a), which says, "It is the policy of the state that: (a) Local agencies integrate the requirements of this division with planning and environmental review procedures otherwise required by law or by local practice so that all those procedures, to the maximum feasible extent, run concurrently, rather than consecutively." Guidelines §15087(i) further says, "Public hearings may be conducted on the environmental documents, either in separate proceedings or in conjunction with other proceedings of the public agency. Public hearings are encouraged but not required as an element of the CEQA process."
		Leading cases on the topic of a stable project description do not support the commenter's interpretation. The project in this case is the City's General Plan. The draft document goes through the hearing process so that it can be reviewed by policymakers and revised as deemed necessary. New information added to the Draft EIR or Revised Draft EIR is not considered "significant" and does not require recirculation unless the documents are changed in a way that deprive the public of a meaningful opportunity to comment on a substantial environmental effect of the General Plan or a feasible way to mitigate such an

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- effect that the City has declined to implement. All modifications which arose from the public hearings have been evaluated, and other than the addition of information relating to climate change and greenhouse gases, none created new or increased environmental impacts of such significance as to require recirculation of the DEIR.
- 48 B **Comment:** Surface Water Element was flawed.
Response: Comment noted; the City respectfully disagrees with the opinion of the speaker.
- 49 **Comment:** Moral responsibility to protect our resources; conservation of the watershed.
Response: The City agrees with the speaker and thus has created the goals, policies and programs within the Draft General Plan to guide the City in its implementation in a manner which protects the natural resources and ensure conservation and enhancement of the watershed and its habitat.
- 50 **Comment:** Concern with impact of widening the River upstream of the transition weir.
Response: Comment noted, see Master Response B.
- 51 **Comment:** Letter on hydrology and bridges in Petaluma.
Response: Comment noted, see Master Response B.
- 52 **Comment:** Market study for land on Lakeville Highway, outside of City Urban Growth Boundary showed need to annex.
Response: Comment noted; the City Council directed that for the timeline of this General Plan and EIR, the Urban Growth Boundary shall remain as adopted in 1998.
- 53 **Comment:** Building sustainable local economy key to long-term success and quality of life.
Response: Comment noted.
- 54 **Comment:** Incomplete integration of the Central Petaluma Specific Plan (CPSP) in the mobility section; and the need to do a road diet on Petaluma Boulevard South. Eliminate the proposed southern crossing because of cost. Pedestrian and Bicycle Advisory Committee needs receive final conditions of approval on all projects it reviews. Would be sad to align the Rainier cross-town connector through the lands left of Rancho Veal.
Response:
- The Draft GP 2025 incorporates the land uses and planning concepts from the CPSP with a few amendments including the extension of Copeland Street to Petaluma Boulevard. Both the CPSP and the Draft GP 2025 support a road diet for Petaluma Boulevard. Policy 2.5 in Chapter 6 of the CPSP calls for reduced travel lanes of Petaluma Boulevard north of East Washington Street and south of D Street within the Specific Plan area. Program 5-P-1.D of the Draft GP 2025 allows for the consideration of road diets City-wide, including Petaluma Boulevard.
 - The proposed extension of Caulfield Lane to Petaluma Boulevard (known as the southern crossing) has long been envisioned as an important link in the City's overall roadway network providing an additional crossing over the Petaluma River and relieving traffic congestion along Washington Street and East D Street particularly when CPSP development occurs. This southern crossing is part of the current 1987 General Plan and the 2003 Central Petaluma Specific Plan. The

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- southern crossing is an essential link for CPSP circulation. Elimination of the southern crossing solely because of cost would adversely impact buildout potential of the CPSP. See Master Response F for additional information on funding for the southern crossing.
- Comment regarding the Pedestrian and Bicycle Advisory Committee is noted. The final conditions of approval are public record.
- Comment regarding the Rainier Cross-Town Connector is noted.
- 55 **Comment:** Pedestrian safety at S. McDowell and Casa Grande intersection; difficult to navigate.
- Response:** Comment not related to adequacy of DEIR. The traffic division of Public Works is looking at existing needs for pedestrian improvements at this intersection.
- 56 **Comment:** Hopes that letters and comments submitted to date regarding cultural resources are taken seriously. Archeological information in the General Plan should extend beyond the historic downtown.
- Response:** In response to public comments and direction from the Planning Commission and City Council the Historic Preservation section of Chapter 3 of the Draft General Plan 2025 will be placed in a chapter (element) of its own. The background, goals, policies, and programs are not limited to the Downtown area but apply equally to historic/cultural resources throughout the community. Policies 3-P-1 through 3-P-8 reflect input and direction received during review of the Draft General Plan 2025.
- 57 **Comment:** Concern with possible expansion of the landfill adjacent to the Petaluma River being built on sensitive wetlands.
- Response:** Redwood Landfill, Inc. has been engaged in a permitting and environmental review process to update its existing SWFP. In its initial application, Redwood requested an increase in daily disposal tonnages and an increase in landfill capacity (accomplished by flattening the top, not enlarging the landfill footprint or increasing the height). In June 2006, at the request of County staff, Redwood committed to implementing the “Mitigated Alternative” if the Marin County Solid Waste Local Enforcement Agency (LEA) ultimately determine that the Mitigated Alternative best matches the County’s recycling, environmental and policy concerns. According to Redwood Landfill Inc. the project the LEA is prepared to approve once the environmental review process is complete, would not increase the area of the landfill or change the facility’s status as a landfill that will serve communities, including Petaluma.
- Additional Mitigation:** The City of Petaluma will ensure that negotiation of future contracts for services within Petaluma will continue to include the identification of recycling and waste stream diversion goals.
- ✓ **Pg. 3.5-28 of DEIR. Addition of Policy 4-P-22** The City of Petaluma will ensure that negotiation of future contracts for services within Petaluma will continue to include the identification of recycling and waste stream diversion goals.
- 58 **Comment:** Funding disconnect for improvements; unacceptable LOS at intersections; finite

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- supply of water – current citizens shouldn't suffer because of growth.
- Response:** Comment noted, see Master Response F for funding connection for planned improvements.
- 59 **Comment:** Lawsuit against Sonoma County Water Agency's Urban Water Management Plan – inadequate. Comments on impacts, greenhouse gases and global warming.
- Response:** The City of Petaluma has taken a proactive approach to water demand and supply through preparation of the Water Demand and Supply Analysis Report (2006), the Water Conservation Plan (2008) and through the work commenced on the City's Recycled Water Expansion Program. The City appreciates the comment author's acknowledgement of the City's proactive approach to dealing with water supply. The City of Petaluma prepared its own independent 2005 Urban Water Management Plan based on water demand and supply work prepared by the City. The plan was approved and unchallenged. See Master Response C and Revised Draft DEIR, Volume 5.A, Appendix G-1, "Greenhouse Gas Emissions" (November 2007); and Master Response D.
- 60 **Comment:** Army Corps project prediction that protection would be degraded at buildout.
- Response:** see Response to Comment #42 C.
- 61 **Comment:** Fee for home occupation permit is too high to allow economic development to occur. Increased home-based businesses reduce greenhouse gas emissions
- Response:** The current fee for home occupation use permit is \$160; ensuring that the applicant complies with local regulations and covers only the administrative cost of processing the application. Greenhouse gas emissions may be reduced from home-based businesses if the assumption is made that the business operator would otherwise drive to employment. Greenhouse gas emissions generated from the home could increase slightly from the home-based business.
- 62 A **Comment:** The commenters are concerned that the Redwood Landfill, one of the landfills serving the City of Petaluma, may pollute adjacent wetlands through leachate contamination. The commenters also question the analysis in the Draft EIR regarding the ability of landfills serving the City of Petaluma to handle additional wastes.
- Response:** The commenters' introductory statements express concern about the potential for leachate pollution to result from the operation of Redwood Landfill. While the City notes these concerns, the comment does not pertain directly to the adequacy of the Draft EIR analysis or to the implementation of the proposed General Plan. This is instead an issue related to the operation and permitting of the landfill, which falls outside the jurisdiction of the City. The landfill operations are subject to regulations and requirements of the Regional Water Quality Control Board, and failure to adhere to those requirements would result in enforcement actions by the Regional Board. No further response is required in this document.
- In the last paragraph on page two of the commenters' letter, the commenters' question the Draft EIR's findings under Impact 3.5-6 (page 3.5-27) that Petaluma's growth-related contributions to any one solid waste facility would be incremental. The Draft EIR

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concludes that the impact of the proposed General Plan at full buildout would be less than significant because the City has contracts with several solid waste providers and thus does not depend on any one facility as a primary provider. For the purposes of clarification, further details regarding Petaluma's solid waste management program are provided below.

Table C&R-1 shows the landfills where the Sonoma County Waste Management Agency (SCWMA), which was the solid waste provider for the City of Petaluma, sent its wastes in 2005. Green Waste is the current provider with permits to dispose of Petaluma generated waste at facilities with adequate permitted capacity to serve the City's needs. Green Waste also has expansive recycled programs, including single stream recycling, green waste recycling and kitchen waste recycling.

According to the CEQA checklist (Appendix G of California Code of Regulations Title 14, Chapter 3), a proposed project would not be considered to have a significant impact for solid waste unless it is served by a network of landfills without combined permitted capacity sufficient to handle the waste stream generated by the project. Sonoma County's 2005 solid wastes were distributed among 19 different landfills with a combined remaining capacity of over 400 million cubic yards. SCWMA contributes only 0.1 percent of the landfills' total annual capacity in terms of volume, while the City's contribution to this total is even smaller. This table demonstrates that SCWMA's contributions to any individual landfill are incremental relative to each landfill's total remaining capacity and that SCWMA could potentially shift a larger percentage of its wastes to other landfills if any one landfill reached capacity.

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Table C&R-1. Solid Waste Facilities Serving the City of Petaluma

Facility Name	Location (County)	Total Site Acreage	Maximum Permitted Throughput (Tons/day)	Maximum Permitted Capacity (Cubic yards)	Remaining Capacity (Cubic Yards)	Total SCWMA 2005 Contribution (Tons)
Altamont Landfill and Resource Recovery	Alameda	2,170	11,150	124,400,000	124,400,000	556
Vasco Road Sanitary Landfill	Alameda	326	2,518	31,942,205	12,279,865	160
West Contra Costa Landfill ^a	Contra Costa	-	-	-	-	26,298
Keller Canyon Landfill	Contra Costa	1,399	3,500	75,018,280	68,279,670	12,999
Bakersfield S.L.F.	Kern	2,285	4,500	53,000,000	44,818,958	29
CWMI Kettleman Hills Facility	Kings	1,600	1,400	4,200,000	1,901,860	200
CWMI - B18 Nonhazardous Codisposal	Kings	1,600	8,000	10,700,000	6,000,000	15
Azusa Land Reclamation Company, Inc.	Los Angeles	283	6,500	66,670,000	34,100,000	630
Redwood Sanitary Landfill	Marin County	420	2,300	19,100,000	12,900,000	151,395
Clover Flat Landfill	Napa	78	600	5,100,000	2,615,644	169
L and D Landfill Company	Sacramento	251	2,540	6,031,055	4,100,000	27
Forward, Inc.	San Joaquin	567	8,668	40,031,058	51,040,000	159
North County Landfill	San Joaquin	320	825	17,300,000	17,300,000	4
Pacheco Pass Sanitary Landfill	Santa Clara	167	1,000	6,200,000	33,013	12
B - J Dropbox Sanitary Landfill	Solano	640	2,400	28,240,000	22,476,431	505
Potrero Hills Landfill	Solano	320	4,330	21,500,000	8,200,000	152,310
Central Landfill	Sonoma	IN ^b	1,050	186,775	IN ^b	186,775
Fink Road Landfill	Stanislaus	164	2,400	14,500,000	10,000,000	39
Covanta Stanislaus, Inc.	Stanislaus	16	1,700	3,200 Tons/day	TBD ^c	1
Total		12,606	65,381	524,119,373	420,445,441	532,283

Notes:

- a. Closed facility.
- b. Insufficient data.
- c. New facility; permitted capacity presently unspecified.
- d. The above table states the facilities' remaining capacity in terms of volume while the annual disposal contributions from any one municipality are reported in terms of weight. According to the Integrated Waste Management Board (IWMB),⁷ this is because volume is subject to change as wastes settle or are subjected to processes such as compaction, shredding, chipping and grinding.

The IWMB fees are based on weight, and the Integrated Waste Management Act of 1989 sets disposal reduction goals based on weight. However, planning for landfill capacity requires consideration of available waste disposal space (i.e. volume). Because of the inherent difficulties in developing a standardized

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conversion factor between the weight and volume of solid wastes, it is impossible to estimate the exact contribution that growth under the proposed General Plan would make to solid waste facilities; however, a conservative one-to-one ton to cubic yard ratio is assumed.

Sources: Integrated Waste Management Board Disposal Reporting System and EIP Associates, a division of PBS&J.

Assuming that current per capita waste generation rates were to remain constant until full plan buildout, new residents and employees would be expected to contribute approximately 23,125 tons per year or 4 percent more solid waste than was produced under SCWMA's jurisdiction in 2005.⁸ This represents less than a 0.006 percent of the landfills' combined remaining capacity.

This information is provided for clarification of the discussion in the Draft EIR and does not alter its conclusions.

62 B

Comment: The Redwood Landfill is located on the edge of the Petaluma Marsh and River Estuary, an environmentally sensitive wetland area, and is an inappropriate place to send City wastes.

Response: While impacts on the natural environment resulting from solid waste handling are an issue of concern to the City, the operation of the Redwood Landfill is not part of the scope of the Draft EIR, which assesses the potential impacts of buildout under the General Plan, nor is the management of the landfill within the jurisdiction of the City. This issue is, in fact, related to the operation and permitting of this landfill, which is not administered by the City of Petaluma.

62 C

Comment: Disposing of City waste in landfills in the Petaluma watershed is inconsistent with language in the proposed General Plan identifying the Petaluma River as a natural habitat..

Response: As discussed in the proposed General Plan, the Petaluma River and its contributing watershed serve many different functions. In addition to providing natural habitat, it is also a backdrop for urban development. Given the growth that is expected to occur in the City of Petaluma, it is impossible to preserve the entire watershed in an undisturbed, natural state. The landfill is an existing facility, and General Plan efforts to protect the Petaluma River as a natural habitat would focus on opportunities to retain existing undeveloped areas and restore areas where feasible. Re-siting the landfill elsewhere would not negate environmental impacts; it would simply shift them to a different location. Therefore, to minimize the impacts of solid waste disposal on the natural environment, the City pursues policies of waste reduction and diversion, such as recycling, composting and source reduction. These policies have been successful to date in diverting 59 percent of the City's annual wastes from the landfill.⁹ Furthermore, as noted above, the landfill is an existing facility adjoining the Petaluma Marsh, and its operational impacts to the marsh are subject to mitigations or conditions applied as result of its permit requirements.

62 D

Comment: Consistency with an eco-system approach requires specific components. The City should make a more vigorous attempt to divert solid wastes from landfills.

Response: The commenters suggest several strategies that the City could use to enhance the sustainability of its solid waste planning and management systems. These comments do not directly apply to the adequacy of the Draft EIR; however, they are noted and will be considered by the City in future planning efforts. It should be noted

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		that the City has recently expanded both residential and commercial green waste management programs.
63		Comment: DSL site needs to remain mixed use.
		Response: The site is designated as Mixed-Use.
64		Comment: DSL site needs to remain mixed use.
		Response: The site is designated as Mixed-Use.
65 A		Comment: No clear policy on the reduction of Greenhouse Gas Emissions.
		Response: See Master Response C.
65 B		Comment: City Programs and policies should include Mandatory Green Building standards and zero increase in VMT system wide.
		Response: The City of Petaluma prepared a Revised Draft EIR which addressed policies and practices to reduce locally generated greenhouse gas/global warming impacts, see Master Response C.
65 C		Comment: The <i>Marin Independent Journal</i> article (3/02/07) cites that a majority of North Bay residents perceive global warming to be a significant threat.
		Response: See Master Response C.
66		Comment: River-dependent designated lands, possible impacts associated with amending land use designation and impacts to river dredging.
		Response: The properties discussed in this comment were not amended; they remain River-dependent Industrial.
67 A - G		Comment: This comment consists of a cover letter listing the contents of an attachment of 150 pages of documents that contains no discussion of the attached documents, identification of issues or concerns, and no explanation of how the attached documents relate to issues or questions about the DEIR.
		Response: 14 California Code of Regulations (“CEQA Guidelines”) section 15204 states that, “If persons and public agencies believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.” The Guideline goes on to say that “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments.” Absent from this commenter’s submission is any specification of significant effects or the necessary connection between those effects and the material presented. Without that connection and specificity, the submission does not constitute substantial evidence nor does it constitute identification of a significant environmental issue. Guidelines sections 15204, 15064. This commenter has also submitted a lengthy extensive letter that does contain specific comments. For the purposes of preparing responses to comments, the City considers this commenter’s narrative comments at Comment 70, FEIR pp. 405-420.5 to be inclusive of all issues this commenter believes to be important for the purposes of raising issues of significant impacts on the environment and/or adequacy of the DEIR and has responded to those issues in

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- Responses 70 A– 70ZZ.
- 68 A** **Comment:** Guiding Principal #11 Global climate change resulting from Greenhouse Gas Emissions.
Response: See Response 19A.
- 68 B** **Comment:** Reduction of Greenhouse Gas Emissions must be key issue.
Response: See Response 19A.
- 68 C** **Comment:** Greenhouse Gas Emissions, sea level rise estimates by the Bay Conservation and Development Commission (BCDC); revised information showing an anticipated rise in sea level as a result of global climate change of one to three feet by the year 2100.
Response: Zero net runoff and zero net fill are both a part of the City’s floodplain ordinance . The Bay Conservation and Development Commission sea level rise estimate of one to three feet by the year 2100 was taken from the 2006 California Climate Action Team Report. On page 31 of this report, the sea level rise is projected to be 2 mm/year based on analysis of California tide gages, which equates to an increase of 200 mm (0.7 feet) from year 2000 to 2100. The higher estimate of 4 to 33 inches (0.3 to 2.8 feet) over the next 100 years appears to be based on the projections from a global climate model, which has unproven accuracy for predicting future events.
- We recommend limiting the scope of engineering decisions to known data trends. The National Oceanic and Atmospheric Administration (NOAA) maintain tide data records, including a tide station on the Petaluma River at the upper drawbridge. Tide data is evaluated within a tidal epoch (approximately 18.5 years) in which averages and extremes are computed, such as the mean higher high water (MHHW) which is typically chosen as the downstream boundary condition for floodplain mapping. The Petaluma Upper Drawbridge station was just updated in early 2007 to the 1983 to 2001 epoch. The MHHW at the Petaluma Upper Drawbridge station increased by about 0.2 feet as a result of updating to the new tidal epoch (which equates to approximately 2 mm/year). However, a data specialist from NOAA warned that this increase is not necessarily the tide increasing, but it could be a function of inadequate ground survey benchmark data at the upper drawbridge or the conversion from the NGVD 29 vertical datum to NAVD 88 using the VERTCON method.
- There is no need to revise the modeling to reflect a higher sea level for the General Plan because the increase due to tidal changes would be the same for existing and proposed buildout conditions, and therefore is not connected to or a function of the proposed General Plan update. In addition, federal regulations stipulate that FEMA mapping is to represent existing conditions, not future conditions, so FEMA mapping cannot be changed to reflect future sea level rise. The tidal areas on the effective Flood Insurance Rate Maps (FIRMs) and profiles for the Petaluma River reflect the 100- and 500-year tide elevation which is based on frequency analysis of tide data (as opposed to the 100- and 500-year storms which are based on frequency analysis of rainfall and/or stream flow data). The downstream boundary condition for FEMA mapping hydraulic calculations was based on

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the MHHW elevation—not the 100- or 500-year tide elevation—due to the improbability of the 100- year (or 500-year) tide and the 100-year (or 500-year) storm occurring at the same time.

Comment: Future energy use projections in the Draft EIR appear to have errors; corrections to Table 3.5-6 and introductory text are requested. An analysis of an alternative project that would reduce energy consumption is needed.

Response: Per the commenter’s suggestions, under the heading, “Baseline Data”, in the original Table 3.5-6 in the Draft EIR, text is corrected to read as follows:

Table 3.5-6: Estimated Total Energy Consumption in Petaluma

<i>Energy Type</i>	<i>Energy Use (standard measurement)</i>	<i>Energy Use (4040 10¹⁰ Btu)</i>
Transportation Fuel	26.73 million gallons	339.85
Natural Gas	12,373,394 therms	123.70
Electricity	483,884 483,884,161 kWh	165.11
Total Use		628.66

Notes: Standard units were converted into British thermal units (Btu). A Btu is the quantity of heat required to raise the temperature of one pound of water from 60 degrees Fahrenheit to 61 degrees at a constant pressure of one atmosphere. One kWh is equal to 3,412.14148 Btu, and one therm is equal to 99,976.124488 Btu.

Sources: California Energy Commission and EIP Associates, a division of PBS&J.¹⁰ (2001)

However, because the information provided in this table is outdated, a revised Table 3.5-6 has been prepared and will replace the existing Table 3.5-6 in the Draft EIR. It updates the 2001 baseline information used in the original table with 2005 baseline data on energy consumption:

Revised Table 3.5-6: Estimated Total Energy Consumption in Petaluma (2005)

<i>Energy Type</i>	<i>Energy Use (standard measurement)</i>	<i>Energy Use (10¹⁰ Btu)</i>
Transportation Fuel	33.23 million gallons	422.493
Natural Gas	12,245,736 therms	122.428
Electricity	455,792,623 kWh	155.523
Total Use		700.444

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Notes:

- a. Standard units were converted into British thermal units (Btu). A Btu is the quantity of heat required to raise the temperature of one pound of water from 60 degrees Fahrenheit to 61 degrees at a constant pressure of one atmosphere. One kWh is equal to 3,412.14148 Btu, and one therm is equal to 99,976.124488 Btu. One million gallons of transportation fuel is estimated to equal 12.7142 Btu, although the heterogeneity of transportation fuels results in variation in this conversion factor over time.
- b. Natural gas and electrical consumption were estimated using unpublished regional energy consumption factors, broken out by different land uses, provided by the California Energy Commission. The factors were multiplied by the square footage devoted to each land use type in 2005, statistics that are maintained by the City of Petaluma.
- c. Transportation fuel consumption was estimated using the transportation model prepared by Fehr and Peers for the Transportation section of the Draft EIR. Fuel consumption is based on annual vehicle miles traveled and current fuel efficiency averages for the State of California.

Sources: California Energy Commission, City of Petaluma Planning Department, Fehr and Peers Traffic Consultants, Winzler and Kelly, and EIP Associates, a division of PBS&J.¹¹

The introductory text for this table in the second paragraph on page 3.5-9 is revised accordingly:

It is estimated that for the year ~~2005~~ 2000, the City of Petaluma used approximately ~~62.866 therms~~ 70.061 million therms of energy (~~700.444 Btu~~). Of that total, approximately ~~60~~ 54-percent of energy consumption is attributed to transportation, ~~17~~ 20-percent to natural gas, and ~~22~~ 26-percent to electricity use. Table 3.5-6 shows the estimated energy consumption by Petaluma.

The commenter claims that there are no strategies for reducing energy use in the proposed General Plan. The proposed General Plan contains several energy conservation goals, which are summarized in the Draft EIR under Impact 3.5-3 (page 3.5-24). While the proposed General Plan does not outline the specific conservation strategies that would be taken to implement these goals, energy conservation goals in the proposed General Plan would be expected to be implemented through area plans, the Petaluma Municipal Code and other planning tools. Upon adoption of the proposed General Plan, implementation strategies would be developed to meet General Plan goals.

Under the heading "Future Trend," the commenter questions why the Draft EIR does not offer an alternative "that would, by design, reduce energy use and its impacts citywide from Baseline conditions." The environmental analysis considers many of the factors that contribute to increased energy consumption (e.g., population growth and housing development) to be unavoidable. An alternative that sought to reduce the City's energy use by further limiting growth beyond constraints identified in the General Plan would not meet the City's community development goals, nor state housing needs allocations and thus would not be considered feasible, or serve as a valid alternative under CEQA. Because population and land use intensity are major factors in predicting a city's total energy use, energy use would be expected to increase over baseline conditions under all realistic growth scenarios. However, as discussed under Impact 3.5-3, the proposed General Plan contains several policies that would increase energy efficiency and reduce the energy use of new users and encourage current users to be more efficient in their consumption patterns. For this reason, while an overall, city-wide decrease in energy use would not be expected

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between baseline and buildout conditions of the General Plan, the proposed General Plan would be expected to decrease average *per capita* usage.

✓ **Tables and text revised per above.**

68 E **Comment:** Recycled water unit costs, relationship to unregulated chemicals and greenhouse gas emissions.

Response: See Master Response (E-H), Response 68C. The use of recycled water for potable offset for water supply is a supplement to SCWA water and both sources are needed to meet the City of Petaluma’s water demands at General Plan build out. The Water Conservation Plan recently approved by the City as a refined version of the conservation programs studied in the Dodson report did take into consideration cost effectiveness when proposing conservation programs that will offset larger portions of SCWA water than originally estimated. The recycled water program is also designed to be implemented in phases, and subsequent phases will track the need for potable water offset before being implemented. A quantitative evaluation of greenhouse gas emissions generated by the SCWA is beyond the scope of the General Plan and this FEIR.

68 F **Comment:** Reduce overall water demand.

Response: The water demands for the Water Demand and Supply Analysis (WD&SA) report were developed based on land use projections and not developed based on population projections. Per the WD&SA report the total potable water usage in Year 2002 was 3,623.19 MG/Year (WD&SA Page 1-4). The population of Petaluma in 2002 was 55,353 (Draft General Plan 2025, Dated May 2007 – Chapter 1.1, prorated per Table 1.1-1). Note that the potable water population and City population do not directly relate since some water users within the City limits are not on the potable system and some users outside the City boundary receive potable City water. At build out (Year 2025) the potable water demand is projected to be 5,138.64 MG/year (WD&SA Page 1-4) minus potable offset from Recycled Water (464.24 MG/Y) and potable offset from Water Conservation (266.30 MG/Y) (WD&SA pg 1-15) = 4408.10 MG/Y (actual potable water demand at buildout). In addition, the potable water usage at buildout must also be reduced by the future water uses not related to the buildout population projection if it is to be evaluated on a per capita basis. Therefore, tier 9 water use, Coast Guard expansion water use, and WRF water use must be removed. The total potable water demand at buildout is then 4161.06 MG/Y. Buildout population is projected at 72,707 (Draft General Plan 2025, Dated May 2007 – Chapter 2, Table 2. 3-4). Please note that the potable water population and City population do not directly relate since some water users within the City limits are not on the potable system and some users outside the City boundary receive potable City water. Per the water use and population data provided, the per capita potable water use would be reduced by 14.4 percent per capita at buildout over current use.

In addition, the City of Petaluma has adopted a Water Conservation Plan which will further increase water conservation. This Plan will provide cost effective potable water offset via water conservation exceeding what was recommended in the General Plan’s

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- 68 G
Comment: Greater efficiency improvements.
Response: Water Demand and Supply Analysis Report, Technical Appendix of DEIR. In addition, other agencies' and cities' water conservation plans and goals were reviewed and evaluated to ensure that water conservation implementation achieved by others could be evaluated for use within the City of Petaluma. Implementation of the Water Conservation Plan will ensure, at a minimum, reduction of water demand as identified in the Water Supply and Demand Analysis Report and Water Conservation Plan documents.
- 68 H
Comment: Watershed groundwater resources.
Response: See response to 68 F. Water conservation experts Bill Maddaus and Ned Orrett were on the project team. The plan will optimize water conservation through implementation of numerous conservation measures well beyond those outlined in the Best Management Practices. Recommendations include measures to ensure that new construction is built with a low water use objective in place. Ned Orrett's involvement was critical due to his objectives to reduce green house gas emissions.
- 68 I
Comment: Watershed groundwater resources.
Response: Most of the City of Petaluma overlies the Petaluma Valley Groundwater Basin (DWR Basin 2-1). A small portion of the northwestern portion of the City overlies the DWR-designated Wilson Grove Formation Highlands Groundwater Basin (DWR Basin 1-59). The Petaluma Valley Groundwater Basin and the Wilson Grove Formation Groundwater Basin are hydraulically connected. However, the degree of interconnection is not well known and is complicated by extensive faulting in the area. All of the City's production wells are located in the Petaluma Valley Groundwater Basin as mapped in DWR Bulletin 118 Update 2003: California's Groundwater. The condition of the groundwater resources in the Petaluma area has been stable since the importation of surface water by Sonoma County Water Agency in 1961. The projected groundwater demands are not anticipated to have a significant impact on the condition of the groundwater basin. DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).
Comment: Impacts from reduced rainfall and/or snow pack.
Response: The condition of the groundwater resources of the Petaluma area reflects a balance between basin inflows and outflows over time. If precipitation decreases in the future, basin outflows must decrease or groundwater levels must decline to establish a new quasi-equilibrium between inflows and outflows.
Additional Mitigation: DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004). The City will continue to monitor well depths and groundwater pumping volumes to ensure a sustainable yield is maintained, see Policy 8-P-20.
- 68 J
Comment: Request to recirculate Revised DEIR.
Response: Greater efficiency improvements.
Response: A Revised DEIR was circulated for the issue of Greenhouse Gas Emissions and Global Climate Change. Water related issues are addressed throughout the Final EIR. See mitigations associated with Greenhouse Gas Emissions impacts, Master Responses B and C.

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- 69 A** **Comment:** In general land use classifications are too extreme at each ends of the density scale.
- Response:** Comment noted. The residential land use classifications range from a low of .1 housing unit/acre in the Rural Residential classification to a high of 30.0 hu/ac in the High Density Residential Classification. This density range allows for a broad range of housing types from ranchettes to apartments to meet the diverse needs of our community. This range of densities also reflects existing development within the community ensuring consistency with what has already been built. The Central Petaluma Specific Plan allows for up to 60.0 dwelling units/acre and reflects an effort to provide higher densities within the City's center.
- 69 B** **Comment:** A comprehensive land use absorption study should be completed in advance of approving the proposed land use map and DEIR.
- Response:** As part of developing the land use map for the Draft General Plan 2025 an analysis of past development and current trends was done in order to ensure that adequate lands for future development of a broad range of uses are available for meeting Petaluma's long-term needs.
- 69 C** **Comment:** The Mixed Use land use designation is being over used and is too vague and should clearly define what percentage of the development shall be residential and what percentage shall be commercial.
- Response:** The majority of Mixed Use lands are located within the Central Petaluma Specific Plan Area, the Downtown Subarea, and along the arterial corridors leading to the CPSP and Downtown. The intention of the Mixed Use designation is to respect the existing diversity of uses within these areas and to encourage further development and redevelopment while providing flexibility. The definition does not require a percentage of residential versus nonresidential uses nor are residential uses required on properties designated as Mixed Use. Clearly defining what percentage shall be residential or commercial would eliminate the flexibility desired by the Mixed Use classification.
- 69 D** **Comment:** The very low Land use Densities outlined in the Rural residential and Very Low Density Residential designations provide little motivation for properties to develop within the City Limits. Eliminate the rural Residential and Very Low Density Residential land use designations.
- Response:** The Very Low and Rural Residential land use classifications are primarily located along the City's western and southern edges where topography and other constraints serve to limit development at higher densities. In many cases, such as the Victoria and West Haven subdivisions, clustering was utilized to provide smaller lot sizes, protect hillsides and habitat, provide significant amounts of open space, and reduce infrastructure needs. In addition these land use classifications support the goals of feathering density at the City's edge. While areas such as the west side of Petaluma Boulevard North do not have significant development potential under the rural land use designation the provision of City services may provide motivation for those properties to

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- 69 E **Comment:** High Density residential density of 18.1 to 30 dwelling units per acre can't be supported by the current infrastructure at most properties.
Response: The majority of land designated as High Density residential is on properties already developed with such uses. Several studies were prepared to evaluate the adequacy of infrastructure and define any needed improvements to serve all land uses within the Urban Growth Boundary, both existing and proposed. Those studies include:
- Technical Memorandum No. 9A Water Balance (February 2002)
 - Surface Water Operations and Maintenance Plan (April 2003)
 - Surface Water Facilities Review (May 2003)
 - Groundwater Feasibility Study (February 2004)
 - Water Supply and Demand Analysis (June 2006)
 - Water Distribution Master Plan (July 2006)
- 69 F **Comment:** Feathering of Density should continue to be an important element in our new General Plan. Spot zoning and parcel specific land use designations should be discouraged. Also, high-density developments on lands near our Urban Growth Boundary (UGB) should not be allowed.
Response: The feathering of densities remains a component of the Draft General Plan 2025 and is articulated both in policy (see Policy 2-P-2) and in the Land Use Map. There are no high-density land uses designated on lands near the UGB.
- 69 G **Comment:** There is no land use designation, which allows for Bulk Retail such as furniture sales found in the Piner Road and Airway Drive areas of Santa Rosa.
Response: The Community Commercial classification allows large-scale retail should the entitlement process authorize the proposed development. The Mixed-Use classification could also, under site-specific circumstances, be considered for bulk retail.
- 69 H **Comment:** The Urban Separator designation has outlived its usefulness since the adoption of the Urban Growth Boundary and should be eliminated.
Response: The Urban Separator is a visual and physical buffer to the rural and agricultural lands beyond the Urban Growth Boundary. The functions of the Urban Growth Boundary and the Urban Separator are different and are not interchangeable.
- 69 I **Comment:** The name of the Business Park land use designation is confusing and does not share the same boundaries as the established business parks in Petaluma. The Office Land use Designation should be retained.
Response: The Business Park "classification is intended for business and professional offices, technology park clusters, research and development, light industrial operation, and visitor service establishments, with retail only as a secondary use." This classification

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- 69 J encompasses the established business parks such as Redwood Business Park, Lakeville Business Park, Oakmead Northbay Industrial Park, Rancho Arroyo, etc. as well as other existing areas of professional office and light industrial uses.
Comment: Too many properties are being converted from Industrial to Office land use designation.
Response: There is no Office land use designation in the Draft General Plan 2025. Many of the properties in existing business park areas (such as those noted above) were designated as Industrial in the 1987 General Plan and have been reclassified as Business Park to better reflect how these areas have developed over time. Areas along North McDowell Blvd, Lindberg Lane, and Petaluma Boulevard South have retained the Industrial classification.
- 70 A
Comment: Need for an Urban Water Management Plan.
Response: The City of Petaluma prepared a 2005 UWMP. A resolution of the City Council of the City of Petaluma adopting the City of Petaluma 2005 Urban Water Management Plan was signed on May 7, 2007. In past years, the City of Petaluma has along with its other SCWA water contractors had their UWMP prepared by SCWA. SCWA started the process prior to the due date of December 2005, but did not complete the UWMP in a timely fashion. The City of Petaluma along with other SCWA contractors then undertook the preparation process for their individual UWMP's independently of SCWA.
- 70 B
Comment: Contingencies for meeting water supply needs during a catastrophic cutoff of supplies.
Response: The City of Petaluma's Water Demand and Supply Analysis (WD&SA) report dated June 2006 is made part of the City's Draft General Plan 2025 identifies the City's groundwater wells as necessary for emergency/backup potable water supply (WD&SA, Page 3-25 and Appendix T). There is no intention, and no identified need to use these wells for ongoing supply. An emergency/backup water source would be required if SCWA experienced a situation where the quality or quantity of water provided to the City was impacted. Such an emergency could result from a SCWA transmission system failure or a problem with the quality of the water being provided to the City by the SCWA. The WD&SA identified a minimal amount of groundwater required for potable use in Year 2024 (Figure 3-9, WD&SA Chapter 3). The City of Petaluma's recently adopted Water Conservation Plan shows cost effective potable water offset via water conservation of almost twice what was recommended in the WD&SA report and eliminates the very minor use of city wells for potable water supply identified in the WD&SA report at the end of the General Plan buildout horizon.
- 70 C
Comment: Providing 40% of ADMM water demand.
Response: See response to 70 B.
- 70 D
Comment: City UWMP.
Response: See response to 70 A.
- 70 E
Comment: Overdraft of Santa Rosa Plain groundwater basin.
Response: The General Plan 2025 water supply program was developed to ensure that the

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City will not require additional SCWA supply beyond its current allocation, and therefore there will be no new or more severe environmental impact on the Santa Rosa Plain groundwater basin from increased use of SCWA water to support General Plan development. All additional potable water demand will be served by a combination of increased conservation and increased use of recycled water. As noted in the Sonoma County General Plan 2020, FEIR, Master Response R, "Groundwater Management", p. 2.1-47, the SCWA and the U.S. Geological Survey, with support from the County of Sonoma, have initiated a \$1.95 million groundwater basin study for the Santa Rosa Plain. The City is not required to anticipate or duplicate that effort for its General Plan update. See also response to 70F. The water supply program analyzed in the DEIR does not envision operation of city wells for anything but extremely limited pumping in emergencies at the far end of the General Plan horizon, and those wells do not implicate the Santa Rosa Plain groundwater basin. The City's recently adopted Water Conservation Program which increases potable water offset and provides an additional safety factor in water supply makes even that possible use of groundwater from City wells extremely unlikely.

The work performed under the Water Demand and Supply Analysis (WD&SA) for the DEIR was based on the City's existing water supply from SCWA of average day max month (ADMM) rate of 17.1 mgd and 4,366.42 MG. Petaluma's entitlement from SCWA is an average day max month (ADMM) rate of 21.8 mgd and 4,366.42 MG (13,400 acre-feet) per fiscal year as outlined under the 11th Amended Agreement for Water Supply. Commencing in September 2001, the Water Contractors and SCWA agreed to negotiate a new water supply agreement. This agreement is currently in the final phase of approval. The new water supply agreement entitled, "Restricted Agreement for Water Supply" will replace the existing 11th Amended Agreement. Under the Restricted Agreement, the City of Petaluma's delivery entitlement will not change.

Although the City of Petaluma's ADMM entitlement is 21.8 mgd, SCWA is currently unable to meet this entitlement. In December of 1999, SCWA declared the system temporarily impaired and in March 2001 the Memorandum of Understanding (MOU) Regarding Water Transmission System Capacity Allocation during Temporary Impairment was executed. This MOU allocated a lower ADMM limit to Petaluma. The original MOU expired on September 30, 2005. In February 2004, the preparation of the new MOU began. The new MOU allocates a total of 92 mgd of available supply to all contractors. The City of Petaluma's ADMM allotment is 17.1 mgd. The new temporary impairment MOU will expire on September 30, 2008.

For planning purposes for future potable water supply needs, the WS&DA report assumed that the current annual entitlement from SCWA of 4,366.42 MG (13,400 acre-ft) per fiscal year as outlined under the 11th Amended Agreement for Water Supply will not change through buildout of the City's General Plan and that all potable water demand above this limit must be obtained from other sources. Similarly, the current SCWA ADMM allotment of 17.1 mgd as outlined in the MOU Regarding Water Transmission System Capacity Allocation During Temporary Impairment is assumed to remain constant within this work

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- 70 F through buildout of the City’s General Plan 2025. All efforts have been made to continue to reduce the demand on potable water from SCWA through offset by recycled water and water conservation; no further mitigations are proposed.
- Comment:** Santa Rosa Plain groundwater; administrative Record of *O.W.L. Foundation et.al. v. Rohnert Park*
- Response:** See Response 70E. This comment also refers to a DVD submitted that contains hundreds of pages (see list of files at FEIR, page 420.1-420.5). 14 California Code of Regulations (“CEQA Guidelines”) section 15204 states that, “If persons and public agencies believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.” The Guideline goes on to say that “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments.” To the extent that the commenter’s letter submission (Comment 70) specifies significant effects and connects those effects to the factual material presented in the DVD, responses are contained in Responses 70A-70ZZ. For the purposes of preparing responses to comments, the City considers this commenter’s letter submission, Comment 70, FEIR pp. 405-420, to be inclusive of all issues this commenter believes to be important for the purposes of raising issues of significant impacts on the environment and/or adequacy of the DEIR.
- The DVD submitted contains the entire administrative record of *O.W.L. Foundation et al. v. Rohnert Park*, a trial court decision from 2006 which is currently before the First District Court of Appeal and which does not constitute legal precedent for Petaluma’s General Plan studies. Unlike Petaluma, Rohnert Park relied on increased groundwater pumping and had not developed a program to provide its increased water needs from recycled water and/or conservation.
- 70 G **Comment:** Impact of City water use on Santa Rosa’s “emergency wells”; need for a Water Supply Assessment.
- Response:** See Response 70 E, F. The city responds here to the commenter’s specific opinion that a Water Supply Assessment is required for the Santa Rosa Plain Groundwater Basin pursuant to S.B. 610. Petaluma’s General Plan 2025 does not approve any specific projects, and does not fall within the definition of Water Code section 10912, one of the sections which codifies S.B. 610. Water Code sections 10910-10912 impose a requirement for a water supply assessment with specified contents as part of CEQA review for the approval of defined “projects.” The Water Code section 10912 definition includes residential, commercial, industrial or mixed use projects generally equivalent in water demand to 500 or more residential units. Petaluma’s General Plan 2025, by law and by its terms, does not approve any specific projects, and therefore is not a “project” which requires a Water Supply Assessment under the definition in Water Code section 10912.
- 70 H **Comment:** Laguna de Santa Rosa monitoring wells capacity.

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- 70 I** **Response:** See Response 70 E.
Comment: Use by SCWA of ‘emergency well’ water to serve contractors, including Petaluma, why?
- 70 J** **Response:** See Response 70 E.
Comment: ‘Modest growth’ versus increase in water use numbers.
Response: The City of Petaluma’s water demand projection methodology is clearly outlined in Chapter 2 of the City’s Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City’s Draft General Plan 2025. The analysis is based on the additional water needed based on how water is currently used within the City of Petaluma in accordance with land use. The water demand does not reflect offset reduction by recycled water or water conservation. Also refer to response to Comment #68F.
- 70 K** **Comment:** SCWA water supply is not all “surface water”, also includes well water from Santa Rosa Plain.
Response: Comment noted.
The reference to surface water in Draft General Plan 2025, Table 8.1-3 will be amended to state “SCWA water”.
- 70 L** **Comment:** Assumptions regarding water increases versus population increases – assumptions for water use per capita.
Response: The City of Petaluma’s water demand projection methodology is clearly outlined in Chapter 2 of the City’s Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City’s Draft General Plan 2025. The analysis is based on the additional water needed based on how water is currently used within the City of Petaluma in accordance with land use. Also refer to response to Comment #68F.
The work performed by the City of Petaluma under the Water Demand and Supply Analysis (WD&SA) project was based on water supply from SCWA of average day max month (ADMM) rate of 17.1 mgd and 4,366.42 MG
Petaluma’s entitlement from SCWA is an average day max month (ADMM) rate of 21.8 mgd and 4,366.42 MG (13,400 acre-feet) per fiscal year as outlined under the 11th Amended Agreement for Water Supply. Commencing in September 2001, the Water Contractors and SCWA agreed to negotiate a new water supply agreement. This agreement is currently in the final phase of approval. The new water supply agreement entitled, “Restricted Agreement for Water Supply” will replace the existing 11th Amended Agreement. Under the Restricted Agreement, the City of Petaluma’s delivery entitlement will not change. (WD&SA Chapter 3, which is made part of the City’s Draft General Plan 2025).
The WD&SA report, Chapter 3 details the methodology used to determine the supply sources and offset sources to be used in each year between 2002 and buildout (Year 2025). Appendix S outlines the data used in preparation of Table 8.1-3 of the Draft General Plan 2025.
Based on the data Chapter 3 and Appendix S in the WD&SA report, table 8.1-3, page 8-4 of

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the Draft General Plan 2025 is incorrect and should be modified as follows:

SCWA

2005 = 3845

2010 = 3136

2015 = 4197

2020 = 4235

2025 = 4359

Water Conservation

2005 = 0

2010 = 1010

2015 = 195

2020 = 233

2025 = 255

All other data is consistent with the WD&SA report.

70 M

Comment: Per capita water consumption numbers per year and projected to 2025.

Response: The City of Petaluma's water demand projection methodology is clearly outlined in Chapter 2 of the City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025. The analysis is based on the additional water needed based on how water is currently used within the City of Petaluma in accordance with land use.

The water demands for the Water Demand and Supply Analysis (WD&SA) report were developed based on land use projections and not developed based on population projections. Per the WD&SA report the total potable water usage in Year 2002 was 3,623.19 MG/Year (WD&SA Page 1-4). The population of Petaluma in 2002 was 55,353 (Draft General Plan 2025, Dated May 2007 – Chapter 1.1, prorated per Table 1.1-1). Note that the potable water population and City population do not directly relate since some water users within the City limits are not on the potable system and some users outside the City boundary receive potable City water. At build out (Year 2025) the potable water demand is projected to be 5,138.64 MG/year (WD&SA Page 1-4) minus potable offset from Recycled Water (464.24 MG/Y) and potable offset from Water Conservation (266.30 MG/Y) (WD&SA pg 1-15) = 4408.10 MG/Y (actual potable water demand at buildout). In addition, the potable water usage at buildout must also be reduced by the future water uses not related to the buildout population projection if it is to be evaluated on a per capita basis. Therefore, tier 9 water use, coast guard expansion water use, and WRF water use must be removed. The total potable water demand at buildout is then 4161.06 MG/Y. Buildout population is projected at 72,707 (Draft General Plan 2025, Dated May 2007 – Chapter 2, Table 2. 3-4). Please note that the potable water population and City population do not directly relate since some water users within the City limits are not on the potable system and some users outside the City boundary receive potable City water. Per the water use and population data provided, the per capita potable water use would be reduced by

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14.4 percent per capita at buildout over current use.

Comment: Guarantee that City emergency wells will not be changed to production wells or demonstrate why they will not be needed.

Response: The City of Petaluma's Water Demand and Supply Analysis (WD&SA) report dated June 2006 is made part of the City's Draft General Plan 2025 clearly indicates that the City's groundwater wells are crucial to emergency/backup potable water supply (WD&SA, Page 3-25 and Appendix T).

The City of Petaluma wishes to reserve existing and future City-owned well capacity for emergency/backup potable water supply. An emergency/backup water source would be required if SCWA experienced a situation where the quality or quantity of water provided to the City was impacted. Such an emergency could result from a SCWA transmission system failure or a problem with the quality of the water being provided to the City by the SCWA. The City's groundwater supply source is the only source that could be used to serve potable water customers during a SCWA emergency. The City's groundwater wells are permitted by DHS and are directly connected to the City's potable water distribution system and could be used to supply water to the City's potable water customers with little notice. Neither water conservation nor recycled water can be used to serve this need. For this reason, it is recommended that the City pursue the option of adding additional City owned wells for emergency/backup supply. Due to the quality issues identified within this report, it is also recommended that the City install well head treatment on the existing wells and any future wells. Appendix T of the WD&SA report includes capital improvement programs developed for obtaining backup/emergency water supply to meet the City's minimum month demand as well as 40% max month demand of water supplied by SCWA.

Since insufficient water supply was identified within the WD&SA report, a minimal amount of groundwater was identified as required for potable use in Year 2024 (Figure 3-9, WD&SA Chapter 3). Since reserving City groundwater for emergency/backup water supply is so vital, the City of Petaluma developed Water Conservation Plan (adopted January 2008) which will further increase water conservation. The Water Conservation Plan shows cost effective potable water offset via water conservation of almost twice what was recommended in the WD&SA report.

70 O

Comment: Evidence that the Ranney collectors are extracting groundwater.

Response: DEIR Section Reference 3.5. SCWA holds appropriative rights to water from the Russian River. Source areas for flow in the Russian River at the SCWA diversion facilities are the Dry Creek watershed, and portions of the Eel River and Russian River watersheds. Water held under these appropriative rights is extracted from Russian River underflow at the SCWA's Mirabel and Wohler diversion facilities. These facilities consist of three Ranney collectors at each of the two locations, for a total of six collectors. The Ranney collectors extract Russian River underflow from alluvial sediments beneath and adjacent to the Russian River. SCWA installs an inflatable dam at Mirabel during peak

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demand months. This dam diverts water into five infiltration ponds to enhance the capacity of the Ranney collectors by increasing recharge to the alluvial aquifer. Extraction through the alluvial aquifer is used instead of direct diversion from the river because the alluvial aquifer provides natural filtering of the water, thereby reducing the need for treatment. There is clearly hydraulic connection between the river and the adjacent alluvial aquifer; this connection is the basis for operation of the diversion facilities. Recently, studies have been conducted at the diversion facilities using heat flow, chloride and specific conductance as tracers (e.g., Constantz, et. al., 2007; Cox, et. al. 2006; Su. et. al., 2007). Several of these studies have documented field measurements demonstrating that unsaturated conditions do exist at some locations near the Ranney collectors. However, it is also acknowledged in the studies that measurements documenting the spatial and temporal extent of the unsaturated zones are limited. Model analysis of hypothetical scenarios involving unsaturated zones of various extents indicated that, for a fixed aquifer permeability, decreasing streambed permeability, in some cases, resulted in a reduced pumping capacity. Also, stream water residence times in the alluvial aquifer increased and the proportion of stream water reaching the collectors diminished. These model results are consistent with the basic hydraulics of stream-aquifer interactions and provide valuable information for SCWA operation and maintenance of the diversion facilities. Diversion facility operations and maintenance practices are intended to enhance recharge of river water and subsequent recovery through the Ranney collectors. The recent results, which were based on hypothetical model scenarios, provide additional insight to operations and maintenance managers.

The Ranney collectors extract water from an alluvial aquifer adjacent to the Russian River. Undoubtedly, some proportion of the extracted water is groundwater, as would be judged based on water quality and heat characteristics. Conversely, some of the surface water is undoubtedly not recovered by the Ranney collectors and recharges the alluvial aquifer. Operational evidence indicates that the recharge ponds and Ranney collectors are, on the whole, effective, and the extracted water is predominately underflow from the Russian River. Although there is some loss of recharged water to the alluvial aquifer and some groundwater captured from it, these effects are not likely to diminish the region's groundwater supply, because the permeable alluvial sediments are restricted to the vicinity of the Russian River (DWR Groundwater Basin 1-60). Much of the regional groundwater use is in other groundwater basins (for example the DWR Santa Rosa Plain Groundwater Subbasin 1-55.01) from older and lower permeability sediments, such as the Wilson Grove and Petaluma Formations. Also, see response 70 E.

References

Constantz, Jim, Grace W. Su and Christine Hatch (2007), Heat as a tracer to examine streambed hydraulic conductance near the Russian River Bank Filtration Facility, Sonoma County, CA (USA), *Riverbank Filtration Hydrology*, Vol. 60, 243-258.
Cox, Maria. H., Grace W. Su and James Constantz, 2006, Comparison of heat with chloride and specific conductance as ground-water tracers near streams, *Geological Society of America, Abstracts with Programs*, Vol. 38, No. 7, p. 330.

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Su, Grace W., James Jasperse, Donald Seymour, James Constantz and Quanlin Zhou (2007), Analysis of Pumping-induced unsaturated regions beneath a perennial river, *Water Resources Research*, Vol. 43, W08421, 1-14.

Comment: The City must plan for 5% cushion of water supply to accommodate year-to-year demand variation.

Response: The City of Petaluma clearly understands the importance of the water demand and supply analysis issue and does not take its responsibility lightly. All work performed takes a conservative approach and accounts for variations in demands. The City of Petaluma's water demand projection methodology is clearly outlined in Chapter 2 of the City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025. It is recognized by the author that water demands do fluctuate and demands are not consistent over time. Such historical fluctuations are fact and can be seen when reviewing past water use data for the City of Petaluma. The analysis performed was based on the additional water needed in accordance with how water was used within the City of Petaluma in the past taking into account the historic fluctuations experienced. The demand estimates made for the City of Petaluma were based on Year 2002 which was a higher than normal water use year to ensure that demand estimates developed were conservative. In addition, the approach taken under the WD&SA work has been verified as conservative since the projections made for water use for years 2003 through 2006 have proved to be significantly higher than the actual water use encountered.

70 Q

Comment: Calculation of seawater intrusion into the Petaluma Coastal Aquifer.

Response: Seawater intrusion occurred in the Petaluma Valley Groundwater Basin near the tidally influenced portion of the Petaluma River. Seawater intrusion affected the shallowest part of the aquifer system, which is comprised of alluvial sediments overlying the Petaluma Formation. The intrusion was most likely caused by pumping from individual supply wells prior to importation of surface water in 1961. The area is now served by the municipal water supply and distribution system. The widespread use of the municipal supply and distribution system, including the use of secondary treated water for agricultural irrigation, has minimized the need for operation of private wells. As a result, seawater intrusion has been halted. DEIR Section Reference E.3, 2.5, 3.5, 3.6, and Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).

70 R

Comment: Yearly increase in seawater intrusion.

Response: Available groundwater quality data indicates that seawater intrusion is no longer occurring. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).

70 S

Comment: Increase in seawater intrusion after City creates new wells.

Response: Municipal pumping by the City of Petaluma is primarily conducted in the Petaluma Formation, which has less hydraulic connection to the Petaluma River than the overlying alluvial sediments. It is not anticipated that municipal pumping will cause impacts due to seawater intrusion. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6,

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70 T		Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004). Comment: When will seawater intrusion be considered irreversible? Response: Irreversible seawater intrusion is not anticipated. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).
70 U		Comment: Means to measure ground subsidence in Petaluma. Response: Inelastic subsidence due to groundwater withdrawal is unlikely to have a significant impact in the Petaluma area. Conditions necessary for inelastic subsidence due to groundwater withdrawal are the presence of significant thicknesses of compressible clay minerals, chiefly montmorillinite, and declines in aquifer pore pressure resulting in an increase in effective stress on the aquifer skeleton, which exceeds the preconsolidation stress. The preconsolidation stress is the maximum effective stress to which the aquifer skeleton has been exposed over geologic time. Extensive compressible deposits are not present and the sediments are relatively well compacted. The hydrogeology of the Petaluma area strongly suggests that the necessary conditions do not exist and monitoring for inelastic land subsidence due to groundwater withdrawal is not warranted. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).
70 V		Comment: If so, how much subsidence has been measured and where. Response: Land subsidence has not been monitored in the Petaluma area because the potential for adverse impacts caused by groundwater pumping is low. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).
70 W		Comment: Projected estimates of ground subsidence due to increased pumping. Response: The geologic formations underlying the Petaluma area are not susceptible to inelastic land subsidence due to groundwater withdrawal. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).
70 X		Comment: Supply estimates do not consider dry year scenarios. Response: The City of Petaluma has prepared a 2005 UWMP. A resolution of the City Council of the City of Petaluma adopting the City of Petaluma 2005 Urban Water Management Plan was signed on May 7, 2007. In past years, the City of Petaluma has along with its other SCWA water contractors had their UWMP prepared by SCWA. SCWA started the process prior to the due date of December 2005, but did not complete the UWMP in a timely fashion. The City of Petaluma along with other SCWA contractors then undertook the preparation process for their individual UWMP's independently of SCWA. The work for the City of Petaluma is based on the City of Petaluma's UWMP. The water demand and supply projections were based on conservative water demand development and supply/offset. This work accounts for normal years and does not include analysis for supply shortages from SCWA; such analysis is included within the City of Petaluma's

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Water Shortage Contingency Plan within Appendix C of the City of Petaluma's 2005 UWMP. The Water Shortage Contingency Plan accounts for rationing stages and reduction goals up to a 50%+ supply shortage. These reduction stages reduce the overall water demand and are not intended to increase water supply through use of the City's potable groundwater wells. The intent of the City's potable water wells is to reserve existing and future City-owned well capacity for emergency/backup potable water supply. An emergency/backup water source would be required if SCWA experienced a situation where the quality or quantity of water provided to the City was impacted. Such an emergency could result from a SCWA transmission system failure or a problem with the quality of the water being provided to the City by the SCWA. A dry year scenario was experienced in 2007 when SCWA requested a 15% reduction in water drawdown, which Petaluma implemented and exceeded.

70 Y

Comment: Contingencies to rectify disparity in dry-year scenario.

Response: See response to 70. X.

70 Z

Comment: Table of Contents should read 'Hydrology and Water Quality'

Response: Comment Noted

Mitigation: Table of Contents has been corrected.

√ See page 'i' in the attached exhibits.

70 AA

Comment: Sea level rise from global warming.

Response: See Master Response B and response to 68.C.

70 BB

Comment: In regard to the New Year's Flood, the DEIR states: "The upper watershed feeding Petaluma Creek and Willow Brook were especially saturated, and the resulting flooding upstream of Corona Road was substantial." An explanation is requested regarding the data this statement is based on, the definition of saturation, whether this saturation is unusual for the time of year, and whether all soils in the watershed have high clay content.

Response: This statement was based on XP-SWMM modeling of the New Year's Flood. The XP-SWMM model data that influenced this statement included rainfall estimates from every available rainfall station in and around the City of Petaluma during the New Year's Flood, hydrologic data such as watershed area, lag time, SCS curve number (which is a function of hydrologic soil group, land cover, and vegetation), watershed shape, infiltration parameters for the Green and Ampt method (for urban watersheds), and a comparison of model results to stream gage data. The calibration to both stream gage data and observed flooding extents revealed that the watersheds upstream of Willow Brook and the Petaluma River were producing much more runoff than expected using the assumption of an average antecedent moisture condition (AMC II). The antecedent moisture condition is another term for watershed saturation—it is a measure of how much infiltration capacity exists in the watershed just before the design storm. Normally, AMC II is the design standard for infrequent events such as the 100-year event but a higher level of saturation was observed for the upper Petaluma River and Willow Brook watersheds for the New Year's storm. Therefore, the antecedent moisture condition was adjusted to AMC III in these watersheds.

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70 CC

A review of the rainfall records preceding the New Year's Flood confirms that a completely saturated condition is justifiable. Not all of the watersheds in the City were adjusted in this manner due to calibration to gage data in other parts of the City. The high clay content of the upper watersheds is a partial explanation of why these basins required a special adjustment. The modeled saturation, in comparison to stream gage data, shows very good correlation between the modeled hydrographs and the observed hydrographs at the gages.

Comment: Should preserve groundwater basins. What steps has the City taken to preserve state-identified groundwater recharge areas? Why not, what contingencies the City has implemented to compensate for a projected loss of recharge and increased flooding?

Response: The majority of potential recharge areas in the Petaluma area are located outside of the City of Petaluma Urban Growth Limit in areas governed by Sonoma County. The City of Petaluma recognizes the importance of these areas for flood control and groundwater recharge and will cooperate with Sonoma County to assess and mitigate the impacts of proposed projects in identified groundwater recharge areas.

The Water Resources Element of the City of Petaluma General Plan contains the following policy and programs:

8-P-20 Manage groundwater as a valuable and limited shared resource by protecting potential groundwater recharge areas and stream sides from urban encroachment within the Petaluma watershed.

A. The City will use discretionary permits to control construction of impervious surfaces in groundwater recharge areas. Potential recharge area protection measures at sites in groundwater recharge areas include, but are not limited to:

- Restrict coverage by impervious materials;
- Limit building or parking footprints;
- Require construction of percolation ponds on site.
- Require surface drainage swales

B. Urge the County when reviewing development applications, to examine the combined impacts of new septic tanks placed in proximity to wells. The County should examine the cumulative impacts of the allowed development densities in the West Petaluma Specific Plan area and compare the results to established water quality standards. Test wells should be required prior to issuing any building permits.

The DEIR, Section 3.13, Hazardous Materials, includes the following policy statement:

10-P-15 Establish special zoning designations and environmental review processes that limit the location of industry, research, and business facilities using hazardous materials. Require safe distances between these sites and residential areas, groundwater recharge areas (see General Plan Chapter 8: Water Resources), and waterways.

Response

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70 DD

Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, 3.13, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).

Comment: What is the cumulative impact of Petaluma’s urbanization—including channelization of creeks, creation of storm drains, development of floodplain storage areas, increase of runoff due to paving—on exacerbation of flooding? Please explain why the DEIR attributes the New Year’s Flood to saturation conditions in rural areas upstream of Petaluma but provides no analysis of flood-inducing conditions within and downstream of Petaluma.

Response: Channelization of tributary creeks and creation of storm drains are not proposed in the General Plan. The City did evaluate the cumulative impact of the General Plan development on exacerbation of flooding by modeling the entire Petaluma River watershed, and the DEIR does provide analysis of flooding within Petaluma as far downstream as Adobe Creek.

The XP-SWMM modeling focuses on the larger scale City-wide impacts of the proposed buildout. By focusing on a larger scale, the model provides an estimate of the expected flow rates and water surface elevations for the modeled streams based on the increased imperviousness that was addressed on a parcel by parcel basis, summarized in the model by watershed. Modeling results suggest there are minor increases in peak flow and water surface elevations as a result of General Plan buildout, but the increase in the mapped flood boundary is negligible (less than a pencil width). This “pencil width” increase throughout the City has a total area of approximately 1.8 acres. See Master Response B and response to 68.C.

70 EE

Comment: If tides influence flooding, then certainly surface flows into the Petaluma River downstream of the weir will also influence flooding. However, the DEIR appears to have omitted these calculations altogether. Please provide the City’s estimates of surface flows into the Petaluma River downstream of the weir and the impacts these flows will have on overall flooding.

Response: The flows downstream of the weir were included in Appendix F4, exhibits following page 3-23. See Master Response B and response to 68.C.

70 FF

Comment: Global climate change models predict the type of storm (related to “Pineapple Express”) experienced in the New Year’s Flood will become more frequent in the future. Please explain why Petaluma’s General Plan and/or the DEIR have no calculations regarding the impending change in rainfall patterns.

Response: The XP-SWMM model was calibrated to the New Year’s Flood, so any increase in those types of storms has been accounted for in the calibrated antecedent moisture conditions and infiltration parameters. Therefore, the General Plan and the DEIR are accounting for such conditions. In addition, General Plan Policies provides for continued monitoring of precipitation data and programs supporting that policy provide efforts for the continued development and calibration of the City’s XP-SWMM model.

70 GG

Comment: The DEIR gives no results from the modeling analysis of impacts associated

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- with a 100-year storm with 2025 buildout. What were the modeling results? Did 2025 buildout change flooding conditions?
- Response:** The comment is incorrect—model runs for 2025 buildout conditions were conducted. Modeling results were included in Appendix F4 and graphically as floodplain boundary maps (Figures 3.6-3 and 3.6-4). The 2025 buildout condition model results show a negligible increase in the mapped flood boundary (less than a pencil width). This “pencil width” increase throughout the City has a total area of approximately 1.8 acres.
- 70 HH** **Comment:** Will the city continue to allow development in the flooded areas that were affected by the New Year’s Flood? If so, please explain why development will continue to be permitted in these flood-prone areas and provide the rationale behind this decision.
- Response:** The physical observations and data collected from the New Year’s Flood have led to a very successful model calibration using XP-SWMM. The model is a tool that will be used to evaluate the effectiveness of possible solutions to the flooding at the design phase, such as the Petaluma River Corridor and additional detention basins. As presented in the DEIR, the General Plan buildout conditions have been modeled and result in negligible increases in flooding relative to existing conditions. In response to comments, WEST revised the XP-SWMM model to incorporate the City’s terracing concept and added detention basins with preliminary sizes and locations dictated by the City. Model runs confirmed that flood hazards were substantially reduced as a result of the channel terracing and regional detention basins. Future modeling will include a 2D component for overbank flows for the area bounded by Willow Brook, the Petaluma River, and Corona Creek to evaluate flooding depths.
- The City will not permit development in the flooded areas until it has convincing evidence that such development would be reasonably safe from flooding. Development in areas with average depths greater than 1 to 1.5 feet would not be permitted.
- 70 II** **Comment:** Scientists predict sea level rise of at least 1 to 3 feet in the next 100 years. Did the model analysis of impacts associated with a “100-year storm” consider change in sea level in 100 years?
- Response:** See response to comment 68C.
- 70 JJ** **Comment:** Please expand on the cause of the New Year’s flooding by providing the City’s understanding of meteorological and geological interactions with a special emphasis on manmade alterations to the terrain as a contributing factor.
- Response:** See response to comment 70BB. The cause of the New Year’s flooding is not necessarily the development itself. Another possible explanation of the flooding is that the New Year’s Flood was very close to a 100-year return interval (see response to comment 115G), and there is a possibility that previous studies including those used to publish FEMA mapping have underestimated the 100-year discharge by not accurately predicting the high antecedent moisture conditions characteristic of the upper Petaluma River and Willow Brook watersheds.
- 70 KK** **Comment:** The DEIR implies that nutrient levels in the Petaluma River are not

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- exacerbated by Petaluma's urbanization. Does urban runoff affect nutrient levels in the Petaluma River? If not, please explain.
- Response:** The City is currently implementing a Stormwater Program to comply with NPDES Phase 2 requirements that addresses all pollutants of concern, including nutrient levels. The three pollutants of concern identified in the Petaluma River by the State Department of Water Resources include pathogens nutrients, and sediment. In March 2003, the City adopted a storm water management plan with the goal of reducing and/or eliminating all pollutants from surface water, including nutrients. All new development is required to meet the conditions outlined in the SWMP to meet this goal.
- 70 LL** **Comment:** What is the increase in storm runoff due to impervious surfaces covering groundwater recharge areas? How much groundwater recharge is lost due to impervious surfaces created as a result of increased urbanization?
- Response:** See Master Response B regarding increase in surface water flows and Appendices F-2 in Volume 4 for groundwater recharge analysis and identification of groundwater recharge areas. See Policy 8-P-20 for measures incorporated into the General Plan for the preservation and enhancement of existing and long-term groundwater resources.
- 70 MM** **Comment:** What is the estimated amount of additional pollution that these surfaces contribute to stream, creek and river pollution levels? Please itemize these pollutants.
- Response:** See Response 70.KK; development must meet the conditions in the City's SWMP to avoid adding pollutants to the surface water system.
- 70 NN** **Comment:** Figure 3.6-2 does not show City Limits and UGB to compare to groundwater basin locations; and no labeling of groundwater basin names.
- Response:** Comment noted; exhibit corrected to add boundaries of City and UGB and labeling of basins. Please refer to Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004). Figure 3.6-2 had been updated.
- ✓ **Corrected exhibit, see attached.**
- 70 OO** **Comment:** Petaluma Valley Basin boundaries in Fig. 3.6-2 do not agree with the groundwater sub-basin boundaries defined in Figure 3 of TM No. 4. Figure 3.6-2 does not reference DWR Bulletin 118 Update 2003 from which Fig 3.6-2 was obtained.
- Response:** DEIR Figure 3.6-2 illustrates the entire San Francisco Bay Hydrologic Region, while TM No. 4 Figure 3 illustrates the Groundwater Sub-Basin boundaries affecting the Petaluma River Valley. The title line of Figure 3.6-2 references its source as Bulletin 118. Figure 3 of Technical Memorandum 4, Groundwater Feasibility Study is a delineation of the watershed boundaries based on topography, as described in the text of the Technical Memorandum. For the purposes of the Technical Memorandum 4, the groundwater subbasin was delineated by the watershed that contributes recharge to the aquifer system underling the Petaluma Valley. This delineation includes parts of the DWR-designated Petaluma Valley Groundwater Basin and Wilson Grove Highlands Groundwater Basin.
- 70 PP** **Comment:** Portions of the City Limits and the UGB are located within the Wilson Grove

Response

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		<p>Formation Highlands groundwater basin; rectify omissions.</p> <p>Response: The DEIR has been updated as requested to state that the City of Petaluma overlies the Petaluma Valley Groundwater Basin and the Wilson Grove Formation Highlands Groundwater Basin. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004)</p>
	√	<p>Amend page 3.6-4 of DEIR to add following text at the end of the second paragraph of the Groundwater narrative, which begins on page 3.6-3: For the purposes of the Technical Memorandum 4, the groundwater subbasin was delineated by the watershed that contributes recharge to the aquifer system underling the Petaluma Valley. This delineation includes parts of the DWR-designated Petaluma Valley Groundwater Basin and Wilson Grove Highlands Groundwater Basin.</p>
70 QQ		<p>Comment: Same comment as PP, above. Because the City extracts groundwater for its urban water supply, the City must analyze sufficiency of groundwater resources in both the Wilson Grove Formation Highlands and the Petaluma Valley groundwater basins when performing future water supply assessments, required by State law.</p> <p>Response: See Response to 70G regarding the inapplicability of the S.B. 610 Water Supply Assessment requirement to the General Plan 2025. In addition, the water supply program analyzed in the DEIR does not envision operation of city wells for anything but extremely limited pumping in emergencies at the far end of the General Plan horizon. The City's recently adopted Water Conservation Program which increases potable water offset and provides an additional safety factor in water supply makes even that possible use of groundwater from City wells extremely unlikely.</p>
70 RR		<p>Comment: Inconsistency between General Plan and DEIR regarding peak demand shortfall (5.0 million gallons per day versus 0.5 million gallons per day); groundwater expectations and explain disparity.</p> <p>Response: A 5.0 million gallon per day (mgd) shortfall in average day maximum month (ADMM) is projected in the Sonoma County Water Agency (SCWA) supply if the Temporary Impairment Memorandum of Understanding (MOU) remains in place until 2025. If the SCWA deliveries are increased to the 11th Amendment amounts, the shortfall in ADMM is projected to be 0.3 mgd in 2024. Water supply planning was based on the assumption that the Temporary Impairment MOU will remain in place until 2025. Under this assumption, plans were developed to meet the projected 5.0-mgd shortfall in SCWA ADMM using a combination of recycled water (3.569 mgd), conservation (1.39 mgd) and groundwater (0.5 mgd). The planned groundwater use of 0.5 mgd can be supported by the groundwater basins. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 2 Appendix C, Water Supply and Demand Analysis Report (June 2006) and Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).</p>
70 SS		<p>Comment: The GP predicts peak demand shortfalls beginning in 2007 and annual demand shortfalls beginning in 2010; yet the DEIR does not predict any shortfalls beginning until 2020; why aren't the DEIR and General Plan consistent?</p>

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Response: Shortfalls between water demand and supply when evaluating utilizing only SCWA supply are shown in the WD&SA report within Chapter 3 (Table 3-1), however, it should be noted that these shortfalls have been resolved within the context of Chapter 3 of the WD&SA report through the use of recycled water for potable offset, water conservation for potable water offset, and groundwater. Refer to WD&SA report, Figures 3-9 and 3-10. The water supply program analyzed in the DEIR does not envision operation of city wells for anything but extremely limited pumping in emergencies at the far end of the General Plan horizon. The City's recently adopted Water Conservation Program which increases potable water offset and provides an additional safety factor in water supply makes even that possible use of groundwater from City wells extremely unlikely. The documents are consistent and show the intensity of work utilized to identify impacts and mitigate those impacts within the document itself.

70 TT **Comment:** The DEIR does not consider constraints related to the Temporary Impairment MOU; why not?

Response: All work performed within the City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 accounts for the Temporary Impairment MOU. (WD&SA report, Chapter 3).

70 UU **Comment:** Neither in Goal 8-G-3 nor in 8-G-4 is there any mention of monitoring of the streams or runoff in areas of tertiary-treated wastewater applications.

Response: The City of Petaluma's Water Recycling Facility (WRF) was designed to the current best technology available for the production of recycled water. All recycled water use will conform to the current Department of Health Services standards. The City of Petaluma prepared a Notice of Intent (NOI) and Water Reuse Program Technical Report and Engineering Report for the Production, Distribution, and Use of Recycled Water. This document was written for the California Department of Health Services (DHS) and the Regional Water Quality Control Board (RWQCB) and covers the City's existing and future secondary and tertiary recycled water systems. A letter of acceptance was issued by the DHS and a letter of approval was received from the TWQCB on October 21, 2005 for General Water Reuse Order No. 96-011. The Notice of Intent (NOI) and Water Reuse Program Technical Report and Engineering Report for the Production, Distribution, and Use of Recycled Water outlines the Reuse applications, water reuse permit program, guidelines for recycled water users, self monitoring program, standard provisions and reporting requirements for water reuse order, state water reuse policies and regulations, monitoring and reporting, water recycling criteria, and numerous other elements to operate the City's recycled water system for compliance with the DHS and RWQCB requirements.

The California Water Recycling Criteria (Title 22) specifically require that recycled water applied to irrigated areas be confined to the area irrigated and runoff and overspray be avoided, *viz.*:

§60310(e)(1) Any irrigation runoff shall be confined to the recycled water use area,

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unless the runoff does not pose a public health threat and is authorized by the regulatory agency.

In compliance with this and other requirements of applicable regulations, the City of Petaluma will be able to protect surface waters from potential co-mingling with recycled water except for flooding and accidents. Even during flooding events, recycled water will not be on the surface to be carried off into the streams. All water from the last irrigation event (and any constituents dissolved therein) will have been absorbed into the soil, used in evapotranspiration, or (a small fraction) moved beyond the root zone. Therefore, no need exists for monitoring the streams or runoff in areas of tertiary recycled water application.

70 VV

Comment: No prediction of how much recycled water will be used in the future in lieu of using SCWA water.

Response: The City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 outlines the potable water supply/offset sources to be used to meet the City of Petaluma's projected potable water demand between 2002 and buildout (2025). The estimated quantity of SCWA supply, recycled water offset, water conservation offset, and City owned groundwater for each year is outlined in the WD&SA report Chapter 3 (Figures 3-9 and 3-10 and Appendix S.

"Wastewater" has not been used and will never be used in the future by the City of Petaluma for any purpose whatsoever. The City of Petaluma will only use disinfected tertiary recycled water—highly treated water produced from the raw material that is "wastewater". The distinction is important in conveying an honest message about the safety of recycled water—and not to confuse or unnecessarily alarm anyone. The anticipated buildout demand for recycled water is expected to total 6.72 million gallons per day (mgd), of which 4.64 mgd would replace current potable water demand. As demand points (customers) are connected to the system, recycled water volumes would gradually ramp up until the total capacity is fulfilled.

The capacity of the water recycling facility would be maintained and expanded as necessary, to keep pace with the increase in demand up to the 6.72 mgd. As with all other water recycling programs in the state—numbering over 200 at the present time—the project would start small and grow as demand for water grows and as the potential for conversion from potable water use improves in the coming years.

70 WW

Comment: The DEIR makes no mention of modern treatment plants; please explain why technology to remove all but the molecule H₂O from the wastewater is not included.

Response: Technically, it is not currently feasible to clean any water source—including sewage—so that nothing but the molecule H₂O remains. There will always remain a number of molecules of other compounds as there is no such thing as a zero concentration of anything in a body of water^{xvi}. High-purity water produced for chip-manufacturing processes undergoes multiple RO processing and arrives at a certain level of purity measured by its resistance to electrical flow, and that number is never zero. As our analytic

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techniques continue to improve, we are able to measure smaller and smaller concentrations of microconstituents in the water (ppm=mg/L, ppb=µg/L, ppt=ng/L, ppq=pg/L, etc.). While each level represents a thousand times lower concentration than the one before it, the measurability of the microconstituent merely indicates its presence and delectability. That does not mean the water is chemical-laden, otherwise, all waters would be chemical-laden. It is neither necessary nor possible to reach zero concentration to have safe water. There is a safe level for any constituent, and many of those have already been established in the Safe Drinking Water Act provisions, with ample safety factors. None is set at zero¹².

The comment appears to equate “modern treatment plants” with only one treatment process: reverse osmosis. This is incorrect as numerous modern process trains exist that are used in tertiary treatment for production of recycled water. There are good reasons for including RO membranes in a treatment train intended for producing recycled water for indirect potable reuse. Treating recycled water intended for irrigation with reverse osmosis provides no significant public health protections (see Master Response E) is very expensive to build and operate, produces a difficult-to-manage brine waste stream, and causes much higher CO₂ emissions into the atmosphere, because of its greater—much greater—need for energy.

The City does not intend to use “chemical-laden sewage” for any purpose now or in the future. Disinfected tertiary recycled water is neither sewage nor is it chemical-laden. It contains extremely low concentrations of chemicals which at higher concentrations would be of concern to the environment and to the public health¹³. Complete removal (to an impossible zero level) is not feasible and serves no useful purpose. Tertiary recycled water used for irrigation offers an environmentally safe way to embed such chemicals into the soil and the vadose zone where they can be decomposed effectively. Also, see Master Response E.

70 XX

Comment: How much, in parts per billion of wastewater or in total metric weight, does the City estimate will be applied to lawns and play fields: of acetaminophen. How much 1,4-Benzoquinone, N-Acetyl-p-benzoquinone Imine is created as a result of exposure to chlorine in the waste stream in a one year period? How much 1,4-Benzoquinone, N-Acetyl-p-benzoquinone Imine is created by domestic chlorination units; how much is created by exposure to household cleansers that contain chlorine; what test has the City used to determine this quantity? How much 1,4-Benzoquinone, N-Acetyl-p-benzoquinone Imine does the City estimate will be applied to lawns and playfields?

Responses: See Master Response E.

a. Acetaminophen (and its derivatives) have been measured in recycled water in the range of <0.009 to 0.043 µg/L (parts per billion)^{xvii}. It is anticipated that the concentration of these chemicals in the Petaluma recycled water will be somewhere within this range. In this context, it is important to bear in mind that recycled water used for irrigation is not intended for drinking and normally does not end up being ingested. The risks of intake of chemicals calculated for drinking water are several orders of magnitude greater than from recycled water^{vi}. Thus, any health concern from the presence of these compounds at these

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concentrations must be viewed in proper context. The context is provided by a calculation of cumulative (lifetime) potential exposure to acetaminophen from several sources, as shown below:

Single therapeutic—safe—dose (mg)	650
Cumulative agricultural worker dose (mg)	0.00007
Cumulative playground user dose (mg)	0.00002
Cumulative recreational swimmer dose (mg)	0.00001

Cumulative doses are calculated by multiplying the daily intake for each exposure scenario (in mg/kg-day) by the averaging time (in days) and the body weight in kg. Averaging times are 9,125 days for an agricultural worker and 2,190 days for playground user and recreational swimmer. Body weights are 70 kg for agricultural worker and 15 kg for playground user and recreational swimmer^{xviii}. The calculated dose for human exposure to acetaminophen is on the order of a million times lower than one therapeutic dose, which is considered safe by the medical profession.

b. Taking the findings of Mary Bender and William MacCrehan^{xix} at face value, the reaction between acetaminophen and chlorine in the wastewater stream would result in molal concentration ratios of 10:3 for 1,4-Benzoquinone (with a stable tail) and 10:1 for NAPQI (at its temporal peak). Accounting for the calculated elevated toxicity of these compounds, “approximately 58 and 25 times more toxic than acetaminophen, respectively”, the net elevated impact of the compounds may be calculated to be 20 times and 2.5 times the impact of acetaminophen itself, respectively. Thus, one way to respond to the Comment would be to multiply these factors by the range of acetaminophen concentration typically measured in recycled water (from <0.009 to 0.043 µg/L (parts per billion)¹⁴). This exercise would result in the following estimates of concentrations and total annual loadings throughout the service area at full development of the project:

Table 70.XX-1 Estimate of Annual Loading of Acetaminophen and Potential Byproducts

Compound	Concentration		Total Loading in grams per year, at 6.72 mgd	Total Loading in Lb/yr, at 6.72 mgd
	Range	µg/L (parts per billion)		
Acetaminophen	<0.009 to 0.043		<0.0002 to 0.001	<0.0000005 to 0.0000002
1,4-Benzoquinone	<0.18 to 0.86		<0.005 to 0.02	<0.00001 to 0.00005
N-acetyl-p-benzoquinone imine (NAPQI)	<0.023 to 0.108		<0.0006 to 0.003	<0.000001 to 0.000006

c. As shown in response to Comment No. 70-XX-b, above, the total amount of these compounds that may theoretically be produced and remain undecomposed through the wastewater disinfection process with chlorine is so infinitesimally small that no credible

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evidence exists that the compounds might have an adverse health effect on human beings or the environment. It is logical that any estimate of byproducts from domestic chlorination units and household products containing chlorine (bleach, mildew sprays, etc.) would result in similarly minute loadings. Household cleansers and domestic chlorination units generally do not have the same opportunities to come into contact with acetaminophen that wastewater treatment disinfection chlorine does. Besides, chlorine dissipates with use in the cleaning process and by evaporation into the atmosphere over time. The annual loading in grams and pounds per year listed in Response to Comment No. 70-XX-b does not rely on estimates of domestic chlorination units or household cleanser use. It relies solely on the typical concentrations of acetaminophen and chlorine in the wastewater stream. No regulatory thresholds have been set for these byproducts of acetaminophen, and no reliable toxicity data are available at these low concentrations. For these reasons, the City does not consider testing for 1,4-benzoquinone and NAPQI a useful undertaking.

d. Refer to response to Comment No. 70-XX-b, above. Essentially, the loadings estimated above would be distributed over the entire irrigated area, resulting in the following calculated loadings per square foot of irrigated land, assuming the high point in the concentration range, and assuming that the irrigated land is 2,000 acres.

Table 70.XX-2. Estimate of Acetaminophen Potential Byproduct Loading (pounds per square foot)

Compound	Maximum Loading in pounds per square foot
Acetaminophen	0.000000000000003
1,4-Benzoquinone	0.000000000000006
N-acetyl-p-benzoquinone imine (NAPQI)	0.000000000000007

The rationale for not having made any estimates is that these numbers are so minute as to be insignificant.

70 YY

Comment: Has the City performed scientific examinations to detect pharmaceuticals in wastewater. If so, results; if not, why not?

Response: Refer to the Master Response E Recycled Water. The City has not performed specific tests for pharmaceuticals in wastewater or recycled water, because these compounds and their occurrence in wastewaters are not regulated by federal or State governments. If at any point it becomes necessary to monitor for the presence and fate of these and other microconstituents in the wastewater stream or in recycled water, the City will be ready to do so. The City has not made specific estimates, because the constituents are unregulated, and the exposure risk is small.

Regarding benzoylecgonine (BE), cocaine, and diacetylmorphine, in parts per million or in total metric weight, the City has not made specific estimates, because the constituents are unregulated, and the exposure risk is small.

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Regarding Ethinylestradiol, Leonorgestrel, and Norethisterone: The City has not made specific estimates, because the constituents are unregulated, and the exposure risk is small. Estimates of loadings per square foot would be on the same orders of magnitude as illustrated in Response to Comment No. 70-XX-d, above.

Regarding estrogens or progestagens: The City has not made specific estimates, because the constituents are unregulated, and the exposure risk is small.

Regarding interleukin-4 PE38KDEL cytotoxin and amounts of other cytotoxins: The City has not made specific estimates, because the constituents are unregulated, and the exposure risk is small.

70 ZZ

Comment: How many parts per billion of Di(2-ethylhexyl phthalate (DEHP) does the City expect to be placed on lawns, pastures & sports fields? If no estimates have been made, please explain why this examination was skipped or deemed unnecessary.

Response: Refer to Master Response E, Recycled Water. In the City of San Diego, Bis (2-ethylhexyl)-phthalate was measured in recycled water ranging from <0.5 µg/L¹⁵ geometric mean to 7.6 µg/L arithmetic mean and in raw drinking water from <0.5 µg/L geometric mean to 4.2 µg/L arithmetic mean^{xx}. Bis (2-ethylhexyl) phthalate concentrations measured in recycled water in San Antonio, Texas were <10 parts per billion (µg/L)^{xxi}. In the Petaluma recycled water, a similar range of concentration of this chemical may be expected, primarily because of its ubiquitous occurrence, and continuous generation and release into the environment.

Regarding parts per billion of Di-butyl phthalate (DBP): Generally, di-butyl phthalate occurs in the environment and in recycled water at a similar range of concentrations as di (2-ethylhexyl) phthalate discussed in Response to Comment 70-ZZ above.

Regarding parts per billion of Di-isononyl phthalate (DINP): Generally, di-isononyl phthalate occurs in the environment and in recycled water at much lower concentrations (or below detection level) than di (2-ethylhexyl) phthalate.

Regarding parts per billion of Di-isodecyl phthalate (DIDP): Generally, di-isodecyl phthalate occurs in the environment and in recycled water at much lower concentrations (or below detection level) than di (2-ethylhexyl) phthalate.

Regarding parts per billion of Benzyl butyl phthalate (BBP): Generally, benzyl butyl phthalate occurs in the environment and in recycled water at much lower concentrations (or below detection level) than di (2-ethylhexyl) phthalate.

70 CD

Comment: Administrative record of litigation

Response: This comment refers to a DVD submitted that contains hundreds of pages of dozens of files (see list of files at FEIR, page 420.1-420.5). 14 California Code of Regulations (“CEQA Guidelines”) section 15204 states that, “If persons and public agencies believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they

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- 71 A believe the effect would be significant.” The Guideline goes on to say that “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments.” To the extent that the commenter’s letter submission (Comment 70) specifies significant effects and connects those effects to the factual material presented in the DVD, responses are contained in Responses 70A-70ZZ. For the purposes of preparing responses to comments, the City considers this commenter’s letter submission, Comment 70, FEIR pp. 405-420, to be inclusive of all issues this commenter believes to be important for the purposes of raising issues of significant impacts on the environment and/or adequacy of the DEIR evidenced by the material in the DVD.
Comment: Concern with proposed terracing of Petaluma River within the Denman Reach and associated downstream impacts.
Response: Denman Flats refers to the area upstream of the Petaluma River and Willow Brook confluence, and includes the Liberty, Wiggins, Marin, and Wilson watersheds. In addition to the modeling presented in the DEIR, WEST Consultants, Inc. (WEST) has also modeled the feasibility of the proposed channel terracing and regional detention basins. WEST revised the XP-SWMM model to incorporate the City’s terracing concept and added detention basins with preliminary sizes and locations dictated by the City. The model is capable of evaluating whether Denman Flats capacity is reduced because it includes storage effects in the Liberty, Wiggins, Marin, and Wilson subbasins. If there would be a reduction in storage due to the lower levels in the Petaluma River, the XP-SWMM model would have reflected this in the hydrograph routing. Model runs confirmed that the Denman Flat detention function was not significantly reduced or eliminated as a result of decreasing the stage in the Petaluma River, and peak flows were not significantly increased upstream or downstream of the proposed terracing project. Therefore, the XP-SWMM model results suggest that flood hazards will not be worsened, in fact, flood hazards were shown to be substantially reduced as a result of the channel terracing and regional detention basins.
- 71 B **Comment:** Concern with draining of upper reaches and possible higher flood elevations during storm events creating over-topping of the flood walls in the Payran Reach area.
Response: See response to 71.A.
- 71 C **Comment:** Question of displacement of floodplains’ capacity to retain flood waters when dirt fill building pads are used.
Response: The floodplain, being the 100 year flood elevation and all areas below, is included in the model. The impacts to flood displacement from future fill placed above the FEMA 100-year flood event is not currently included.
- ✓ **An additional program has been added to Policy 8-P-36 to amend the floodplain development regulations to require fill above the FEMA 100-year elevation be included in the zero-net fill balance calculation to the elevation of the finished floor.**
- 71 D **Comment:** No identification of impact of using dirt fill building pads, therefore no mitigation.

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- 71 E** **Response:** See response 71.C.
Comment: Reference to December 2005 storm event as 100-year storm may not be accurate. A true 100-year storm covering majority of Petaluma can be expected to produce far greater flooding.
Response: The 100-year storm event was modeled as covering the entire watershed which incorporates the entire City. Rather than applying a single rainfall depth for each sub-basin, the 100-year rainfall depth computed at the Fire Station gage (with 94 years of data through 2006) was adjusted as necessary for each of the 97 sub-basins based on observed rainfall distribution patterns in the watershed.
- 71 F** **Comment:** List of tributaries to the Petaluma River does not include the Cherry Magnolia Conduit. The seven foot diameter pipe is beyond capacity during storm events.
Response: The contribution of this sub-basin is included in the model, applied at Node PR_0360, downstream of the Payran Street bridge.
- 71 G** **Comment:** Reference to use of detention/retention – need more specific info (location, capacity, timing)?
Response: The XP-SWMM model run included the development of River corridor terracing and detention/retention facilities (see Surface Water Model Calibration and Analysis Report, Technical Appendices F-4, Volume 4). Possible detention locations are illustrated in the Sonoma County Water Agency Surface Water Master Plan for the Petaluma River Watershed.
- 71 H** **Comment:** Typo of SWCA, should be SCWA.
Response: Comment noted, typo will be fixed.
- 71 I** **Comment:** Concern on process and whether comments received today will be received and evaluated.
Response: All comments received up to and including the last public hearing on the adequacy of the Draft EIR have been included and responded to within the Final EIR document.
- 72 A** **Comment:** With respect to the Davidon property, where in the General Plan or the DEIR is any reference made to the 6 acres of trail to be provided?
Response: The Draft General Plan 2025 and DEIR do not make reference to 6 acres of trail to be provided on this site. However, they do provide for the provision of 14 acres of Urban Separator and 6 acres of open space along the creek, both of which would contain pathways extending through the property and connecting to Helen Putnam Regional Park as delineated in Exhibit 5-3, the Proposed and Existing Bicycle Facilities map.
- 72 B** **Comment:** Where in the Draft General Plan or the DEIR is any reference made to the 14 acres of urban separator on the Davidon property?
Response: An Urban Separator located along the southern edge of the property is clearly delineated on the Land Use Map (GP Figure 2-1, DEIR Figure 2.4-1) and is scaled at 300 feet in width or approximately 14 acres in size. The Parks and Open Space exhibit (GP Figure 6-1, DEIR Figure 3.3-1) also depicts the Urban Separator on this parcel, however

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		<i>Note: Please refer to the full set of Comments on the Draft EIR for the complete comment; comment summary contained herein is intended for general information only.</i>
72 C		<p>there is a drafting error depicting the Urban Separator at 100 feet in width, this error will be corrected for consistency with Figure 2-1.</p> <p>Comment: Will the Urban Separator include trails or any public access?</p> <p>Response: As delineated on the Proposed and Existing Bicycle Facilities Map (Exhibit 5-3) the Urban Separator on this site includes a proposed trail connecting D Street and Helen Putnam Regional Park. In addition General Plan Policy 6-P-12 states: "Locate recreation uses (e.g., trails, athletic fields, picnic areas, etc.) in the urban separator on the east and west sides of the city, taking into account terrain, accessibility, links to other parts of the city and related factors in determining whether or not particular use is appropriate."</p>
72 D		<p>Comment: What will be the environmental impact of maintaining the classification of the park at the Davidon site as "neighborhood" if that means no parking spaces, restrooms, playground, transit shelter, bike racks, community building, etc?</p> <p>Response: There is nothing in the description of a neighborhood park that would preclude parking, restrooms, playgrounds, bike racks, etc.</p>
72 E		<p>Comment: What will be the environmental impact of maintaining such a park as "passive" in view of the need on the Westside for active recreational facilities, such as ball fields and courts? What scientific or engineering analysis has been done at this site to determine that it is or is not suitable for such active sports?</p> <p>Response: It could be argued that a passive park has fewer environmental impacts than an active park requiring significant grading, hardscape/landscape, and other physical improvements. A project level review would provide the scientific and engineering analyses necessary to determine the feasibility of the site for active sport facilities. Such analyses are not appropriate at the scale of a General Plan EIR but would be required as part of any project review for the site.</p>
72 F		<p>Comment: What is the impact of not preserving the red barn and other buildings? What will be the impact on public patterns of facility use and transportation if the barn is not made available for community events for Westside residents?</p> <p>Response: While the Draft General Plan 2025 does not speak directly to the preservation of the red barn and accompanying buildings there is already adopted policy regarding historic review of structures 45 years or older prior to demolition. Consideration of the historic status and value of the red barn and other structures on the site would be required as part of any proposed project's review. Currently the barn is not available for community events so its loss would not result in an impact on public patterns of facility use and transportation.</p>
72 G		<p>Comment: If the City does not make special provision for more extensive public park land use in the area adjacent to Helen Putnam Regional park, what is the environmental impact of losing the opportunity to expand Putnam park between Western and D Streets?</p> <p>Response: The provision of 14 acres of Urban Separator, a minimum of six acres of open space, and a minimum of 3 acres of parkland provides an opportunity to effectively expand Helen Putnam Regional park between Western and D Streets. Project level environmental</p>

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		<i>Note: Please refer to the full set of Comments on the Draft EIR for the complete comment; comment summary contained herein is intended for general information only.</i>
72 H		<p>review of any proposed development for this site would assess the need for any additional park/open space lands.</p> <p>Comment: What is the impact of losing this unique asset, close to the city, upon the potential for outdoor recreation and education for our families and school children?</p> <p>Response: There is currently no opportunity for outdoor recreation and education on this site as it is private property. The Draft General Plan 2025 envisions at a minimum six acres of open space, three acres of park, and fourteen acres of urban separator for a total of twenty-three acres of the 58.9-acre site available for outdoor recreation, habitat protection, and educational opportunities.</p>
73 A		<p>Comment: Petaluma River Access and Enhancement Plan (River Plan): Implement it fully by explicit General Plan language, now missing.</p> <p>Response: General Plan comment, not relevant to DEIR adequacy. Respectfully disagree with comment; see text on General Plan page 1-14 (final GP document page i-14); Policies 1-P-39, 2-P-56, 2-P-58, and 4-P-1.A. The General Plan section on the River goes beyond the River Access and Enhancement Plan with the identification of the Petaluma River Corridor, thereby requiring wider river setbacks than originally envisioned within the River Plan.</p> <p>The River Plan is an adopted Plan and remains in full force and effect into the next General Plan. The River Plan, Central Petaluma Specific Plan, Corona-Ely Specific Plan, and Bicycle and Pedestrian Plan are all incorporated by reference; see Section i.6 “Related Documents, City Plans and Programs” of the General Plan.</p>
73 B		<p>Comment: The DEIR does not reference the River Plan.</p> <p>Response: The Petaluma River Corridor (PRC) identified in the Draft General Plan and Draft EIR requires the setting aside of lands to allow the continued implementation of the River Plan. The River Plan remains a Master Plan for the River corridor and is incorporated into the General Plan 2025 document by reference (see response 73 A). The River Plan is discussed in the Parks and Recreation portion of the DEIR (Section 3.3).</p>
73 C		<p>Comment: The DEIR does not discuss the potential for leaving sections along the River around the Factory Outlets as parkland.</p> <p>Response: The Draft General Plan and DEIR both provide for a 400-foot corridor along the Petaluma River through the Petaluma River Corridor. The purpose of this corridor is for floodplain management (e.g. terracing), habitat restoration/enhancement, and public access which similar to the recently completed project at Industrial Avenue and Corona road will serve as an important component of the City’s parks and open space lands. The dedication of entire parcels adjacent to the Petaluma River and Factory Outlets was not identified in the alternatives analysis. Dedication of the parcel north of the Factory Outlets as a park was considered as part of the proposed outlet expansion but was not considered feasible due to potential for seasonal inundation and its impact on sports fields.</p>
73 D		<p>Comment: Separate the Rainier cross-town connection project and development within the Corona Reach within the DEIR.</p>

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- 73 E** **Response:** The Rainier cross-town connector and interchange project has been proposed since the early 1960's General Plan. Long range mobility planning has predicated development since that time on this project including buildout of the Corona-Ely Specific Plan, location of the Santa Rosa Junior College Petaluma Campus, and Petaluma Valley Hospital, etc. Rainier is not a project solely designed to serve development within the Corona Reach area but rather a needed and overdue improvement to serve the entire community by increasing connectivity within the northeast and northwest portions of Petaluma while at the same time reducing impacts to East Washington Street and the central portion of Petaluma.
- 73 E** **Comment:** Implement the Central Petaluma Specific Plan and incorporate into General Plan.
- 73 F** **Response:** The CPSP remains fully intact as adopted with very minor amendments through the General Plan adoption process. The CPSP is referenced within the Introduction section and the Community Design Element of the General Plan. The road diet was addressed in response to comments on the Mobility element.
- 73 F** **Comment:** Chapter 3 incorrectly identifies a sub-area as the CPSP, which does not correspond to the boundaries of the CPSP.
- 73 F** **Response:** The comment is correct in that the Planning Subareas exhibit (GP Figure 3-2, DEIR Figure 3.1-2) contains a drafting error in an area of Petaluma Boulevard South between G Street and the McNear Landing subdivision. This error has been noted and will be corrected on future exhibits. The intent is that the boundaries of the CPSP Subarea and the adopted CPSP are coterminous.
- 73 G** **Comment:** The DEIR is lacking regarding Mitigation: effects of CPSP traffic improvements.
- 73 G** **Response:** The mitigations contained in the CPSP Final EIR remain intact and will be implemented; there is not intent to supersede or replace those mitigations within the context of the General Plan FEIR.
- 73 H** **Comment:** Protect the Fairgrounds as a public green not an already-almost-decided retail spot with a 7 acre park maybe.
- 73 H** **Response:** Comment noted. The existing footprint of the fairgrounds is protected with a Public/Semi-Public land use designation consistent with the current 1987 General Plan classification as Institutional. In addition the Sonoma County Library/Kenilworth Park block and the Swim Center/Skate Board Park are designated as City Park along with a proposed 20-acre park. A portion of the property has been designated as Mixed Use along the East Washington portion of the site to meet the goals outlined in the community Design, Character, and Green Building element. The Fairgrounds has not been envisioned for retail development.
- 73 I** **Comment:** Reclaim Cavanaugh Landing as a real destination pocket park, and eliminate the parking lot which has been placed to benefit the restaurant and re-install the benches that at one time gave the public a free seat for every night's sunset.

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- 73 J** **Response:** Cavanaugh Landing remains a pocket park in the Draft General Plan 2025. The inclusion of amenities and use of parks is a matter for discussion through the Recreation, Music, and Parks Commission and is beyond the level of detail in the General Plan
Comment: The General Plan wants to allow parking reductions to encourage infill; it should include commensurate encouragement of non-motorized travel in order to qualify.
Response: The General Plan includes extensive planned improvements for non-motorized travel including pedestrian and bicycle route expansions and improvements.
- 73 K** **Comment:** Schools: clarify the joint use agreements, put them clearly on maps and make sure all Urban Separator joint use agreements permit citizens to access those Urban Separators at any time, just like in non joint-use areas such as King’s Mill, etc. and encourage rather than discourage bicycling to school.
Response: The joint-use facilities outlined in the Recreation, Music, Parks, and the Arts element will be added to the Parks and Recreation Exhibit (GP Figure 6-1 and DEIR Figure 3.3-1). Issues such as public access and improvements of such facilities are matters for negotiation as part of those agreements. From a bicycle/pedestrian standpoint the Bicycle Plan and General Plan both depict the provision of trails within those joint-use areas along the Urban Separator.
- 73 L** **Comment:** Failure to discuss one large mitigation against the Impact 3.10-1 which is “buildout of the proposed General Plan would result in population levels that could conflict with the Bay Area 2005 Ozone Strategy” is the complete turnaround of the schools’ attitudes about bicycling on campus and the utilization of joint-use lands for pedestrian/bicycle travel.
Response: Sections 5.5 and 5.6 of the Mobility Element in addition to the updated Bicycle and Pedestrian Plan place a strong emphasis on alternative travel modes in meeting Petaluma’s future mobility goals. Among them policies and programs geared toward Safe Routes to School and increased walking and bicycling to school. The City is currently in the process of implementing enhanced crosswalks (in pavement flashing lights) at 9 locations adjacent to schools through a Safe Routes to School grant. In addition, City Staff has met with the Petaluma School District to discuss ways in which the City and District can work together to promote and increase the number of students walking/bicycling to school. An updated Safe Routes to School Plan was prepared in October 2005.
- 73 M** **Comment:** PBAC should receive final conditions of approval on all projects they review.
Response: See response to 54.
- 73 N** **Comment:** SPARC should not be gutted in this general plan. Any decision like that does not belong in that draft document, but belongs in a public forum. On the contrary, SPARC’s purview should be expanded to include examination of air and water quality effects of any proposed development, as well as protection of historic neighborhoods even beyond “formal historic” designations.
Response: Comment noted. The comment reference about SPARC is from the Housing Element which is an adopted and State-certified document that has already been reviewed

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- 73 O through a public process. The Draft General Plan 2025 incorporates the Housing Element as adopted. It is scheduled to be updated in 2009.
Comment: Who will enforce the City’s proposed “green building policies?”
Response: As part of the City Council’s review of the Draft General Plan 2025, Council provided direction to make the City’s voluntary green building program mandatory. The details of this program, its implementation, and enforcement will be developed by the Community Development Department and is beyond the scope of the General Plan.
- 74
Comment: Critical that hillside regulations be in place before adoption of General Plan.
Response: The City Council considered this request and directed that the Community Development Department proceed with the work effort to prepare the Development Code, which will include the Hillside protection and development regulations. It is anticipated that interim legislation will be presented for consideration by the City Council concurrently with their consideration of the final General Plan 2025 document. Hillside development must already meet stricter requirements to protect surface water quality from excessive erosion and sedimentation, as outlined in the City’s Storm Water Management Plan.
- 75 A
Comment: Concern with owner-requested density at 1436 Western Avenue from Rural Residential to Very Low Residential; background material, meeting notes, petition.
Response: Direction from City Council was to retain the Rural Residential designation.
- 75 B
Comment: Recommended General Plan text amendments.
Response: The requested Plan text changes do not affect the environmental issues contained in the DEIR.
- 75 C
Comment: The commenter requests a minor revision in the definition of *Grasslands/Oak Savannah* habitat on page 3.8-1 of the Draft EIR, notably in reference to the last sentence.
Response: Agree with suggested text wording.
√ The last sentence in the definition for *Grasslands/Oak Savannah* (on page 3.8-1 of the Draft EIR) is modified to read as follows:
In ~~many~~ some areas, ~~severe levels of~~ grazing has reduced these plant coverings to the extent that bare ground is visible.
- 75 D
Comment: The commenter suggests that there is a difference in species listed in the legend of Figure 3.8-1 and Table 3.8-1, where he thought they should be identical.
Response: Table 3.8-1 lists potential special status species within the planning area only, as indicated on page 3.8-2 of the Draft EIR, while Figure 3.8-1 depicts the actual occurrences or locations of species in the planning area and the Urban Growth Boundary for Petaluma according to the California Natural Diversity Data Base (CNDDDB, 2005). The primary difference between them thus pertains to the species that are not depicted on the figure because their habitat is non-specific. This circumstance refers to the several bat species in Table 3.8-1 which are listed as “occurring throughout the planning area.”
However, the commenter also identified several species that should appropriately be added

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to the table. The following species are thus added by reference to Table 3.8-1, as suggested by the commenter: American badger; Allen's Hummingbird; Rufous Hummingbird; Sharp-Shinned Hawk; Oak Titmouse; Redbreasted Sapsucker; and Long-billed Curlew [as observed in the Paula Lane area of Petaluma].

The white-tailed kite is listed in Table 3.8-1 because the bird was previously considered a Species of Concern by the US Fish and Wildlife Service (USFWS). The USFWS no longer maintains their list of Species of Concern. The species is also listed in the Petaluma General Plan Table 9-1.1, "Special Status Species Known to Occur or Potentially Occurring within the Petaluma Planning Area." Figure 3.8-1 only shows the CNDDDB recorded occurrences within the planning area. Since there are no recorded occurrences of the white-tailed kite in the planning area, the species is not depicted in the corresponding figure, although it is expected throughout the coastal and valley lowlands in California, including Petaluma. ¹⁶ The special status avian species documented by Dan Nelson as occurring in the planning area have also not been recorded in CNDDDB, and therefore are not shown on Figure 3.8-1. To clarify the species that are found in Table 3.8-1, it is re-named "Special Status Species with the Potential to Occur within the City of Petaluma General Plan Planning Area."

✓ Revisions to Table 3.8-1 are shown on the following pages.

Table 3.8-1: Special Status Species with the Potential to Occur within the City of Petaluma General Plan Planning Area

Species Name	Federal	State	CNPS ⁽³⁾	Habitat	Habitat Present	Potential for occurrence within Study Area
Invertebrates						
Conservancy fairy shrimp <i>Branchinecta conservatio</i>	Endangered		Vernal Pools		yes	low
Longhorn fairy shrimp <i>Brachinecta longiantenna</i>	Endangered		Vernal Pools		yes	low
Vernal pool fairy shrimp <i>Brachinecta lynchi</i>	Threatened		Vernal Pools		yes	low
Marin blind harvestman <i>Calicina diminua</i>			Found in serpentine habitats on Mount Burdell in Novato, California.		no	none
Sonoma arctic skipper <i>Carterocephalus palaemon ssp.</i>			Found in Redwood forests		no	none
Ricksecker's Water scavenger Beetle <i>Hydrochara rickseckeri</i>			Found in freshwater ponds, streams, marshes, and lakes.		yes	moderate
Vernal pool tadpole shrimp <i>Lepidurus packardii</i>	Endangered		Vernal Pools		yes	low
Myrtle's silverspot butterfly <i>Speyeria zerene myrtleae</i>	Endangered		Restricted to the foggy coastal dunes of the Point Reyes Peninsula		no	none
California freshwater shrimp <i>Syncaris pacifica</i>	Endangered	Endangered	Shallow pools away from the main channel of the stream or creek.		yes	moderate
Fish						
Tidewater Goby <i>Eucyclogobius newberryi</i>	Endangered		Inhabits shallow lagoons and the lower reaches of coastal streams.		yes	low
Delta Smelt <i>Hypomesus transpacificus</i>	Threatened	Threatened	Sacramento-San Joaquin Delta as salinities less than 2 PPM. Generally not found in smaller freshwater streams.		no	none
Russian river tute perch <i>Hysteroecarpus traski pomu</i>			Low elevation streams of the Russian River		no	none
Pacific Lamprey <i>Lampetra tridentate</i>			Adult lampreys require gravel riffles in streams for spawning.		no	low
Central Coast Coho salmon <i>Oncorhynchus kisutch</i>	Endangered				yes	low
Central Coast Steelhead <i>Oncorhynchus mykiss irideus</i>	Threatened				yes	Spawning habitat in Adobe Creek, Willow Brook, San Antonio Creek
Central Valley Steelhead <i>Oncorhynchus mykiss irideus</i>	Threatened				no	none
Central Valley spring-run Chinook salmon <i>Oncorhynchus tshawytscha</i>	Threatened				no	none

Table 3.8-1: Special Status Species with the Potential to Occur within the City of Petaluma General Plan Planning Area

Species Name	Federal	State	CNPS ⁽³⁾	Habitat	Habitat Present	Potential for occurrence within Study Area
Sacramento River, Winter-run Chinook salmon <i>Oncorhynchus tshawytscha</i>	Endangered				no	none
Central Valley fall/late fall-run Chinook salmon <i>Oncorhynchus tshawytscha</i>	Candidate				no	none
Sacramento splittail <i>Pogonichthys macrolepidotus</i>		Species of Special Concern	Found in the San Francisco Bay delta, Suisun bay and associated marshes.		yes	Known CNDDDB occurrences
Longfin smelt <i>Spirinchus thaleichthys</i>			Found in estuaries of the San Francisco Bay		no	none
Amphibians						
California Tiger Salamander <i>Ambystoma Californians</i>	Threatened	Species of Special Concern	Vernal pools and seasonal wetlands.		Yes	Known CNDDDB Occurrences
California Red-legged Frog <i>Rana aurora draytonii</i>	Threatened	Species of Special Concern	Pools in slow-moving streams and ponds with well-developed emergent freshwater marsh vegetation (Jennings and Hayes 1994).		Yes	Known CNDDDB Occurrences
Northern red-legged frog <i>Rana aurora aurora</i>		Species of Special Concern	Usually found in dense riparian areas in woodlands and forested areas.		yes	moderate
Foothill yellow-legged frog <i>Rana boylei</i>		Species of Special Concern	Found in shallow streams and riffles with rocky substrate.		yes	Known CNDDDB occurrences
Western Spade-foot Toad <i>Scaphiopus hammondi</i>		None	Vernal pools and seasonal wetlands.		Yes	moderate
Reptiles						
Western Pond Turtle <i>Clemmys marmorata</i>		Species of Special Concern	Ponds, lakes, slow moving streams areas with multiple aerial and aquatic basking sites are preferred (Jennings and Hayes 1994).		Yes	Known CNDDDB Occurrences
Northwestern Pond Turtle <i>Clemmys marmorata marmorata</i>		Species of Special Concern	Ponds, lakes, slow moving streams areas with multiple aerial and aquatic basking sites are preferred (Jennings and Hayes 1994).		Yes	Known CNDDDB Occurrences
California horned lizard <i>Phrynosoma coronatum frontale</i>			Commonly found in lowlands along sandy washes with scattered low bushes		yes	moderate
Birds						
Cooper's hawk <i>Accipiter cooperi</i>		Species of Special Concern	Dense stands of live oak, riparian deciduous, or other forest habitats near water used most frequently.		yes	low
Sharp-shinned hawk <i>Accipiter striatus</i>		Species of Special Concern	Found in a variety of forest types throughout California. They often occupy north-facing slopes. Plucking perches are a critical habitat requirement for this bird.		yes	moderate
Tricolored Blackbird <i>Agelaius tricolor</i>		Species of Special Concern	Colonial nester that uses tules or bulrush for nesting. Also requires open water and nearby source of insects to prey on.		yes	low
Bell's sage sparrow <i>Amphispiza belli belli</i>			Found in chaparral habitats dominated by dense stands of Chamise		no	low

Table 3.8-1: Special Status Species with the Potential to Occur within the City of Petaluma General Plan Planning Area

Species Name	Federal	State	CNPS ⁽³⁾	Habitat	Habitat Present	Potential for occurrence within Study Area
Western Burrowing Owl <i>Athene cucularia</i>				Uses rodent burrows in sparse grasslands, desert, and agricultural habitats.	yes	moderate
Golden eagle <i>Aquila chrysaetos</i>		Species of Special Concern		Habitat typically rolling foothills, mountain areas, sage-juniper flats, desert.		moderate
<u>Oak Titmouse <i>Baeolophus inornatus</i></u>		<u>Species of Special Concern</u>		<u>The oak titmouse is a common resident in a variety of habitats, but is primarily associated with oaks. Occurs in montane hardwood-conifer, montane hardwood, blue, valley, and coastal oak woodlands, and montane and valley foothill riparian habitats in cismontane California.</u>	<u>yes</u>	<u>moderate</u>
Ferruginous Hawk <i>Buteo regalis</i>	Threatened	Species of Special Concern		Winters in a variety of habitats in California.	yes	moderate
Red knot <i>Calidris canutus</i>				Found on sand beaches with adjacent mudflats.	yes	low
Western yellow-billed cuckoo <i>Coccyzus americanus occidentalis</i>	Candidate	Endangered		Nests in dense riparian areas, usually in willows or cottonwoods.	yes	Known CNDDDB occurrences
Vaux's swift <i>Chaetura vauxi</i>				Found in conifer forests. Forages over rivers and lakes	no	low
Western snowy plover <i>Charadrius alexandrinus nivosus</i>	Threatened			Sandy beaches, salt pond levees and shores of alkali lakes	yes	low
Black swift <i>Cypseloides niger</i>				Requires cliffs for nesting.	no	low
White Tailed Kite <i>Elanus leucurus</i>				Grasslands, agriculture, wetlands, oak-woodland and savannah habitats, and riparian areas associated with open areas.	yes	high
Little willow flycatcher <i>Empidonax traillii brewsteri</i>		Endangered		Inhabits extensive thickets of low, dense willows on the edge of wet meadows, ponds, or brackish waters.	yes	low
Merlin <i>Falco columbarius</i>		Species of Special Concern		Ranges from annual grasslands to ponderosa pine and montane hardwood-conifer habitats.	yes	low
American peregrine falcon <i>Falco peregrinus anatum</i>		Endangered		Nests on cliffs or ledges near wetlands, lakes, and rivers.	no	low
Saltmarsh Common Yellowthroat <i>Geothlypis trichas sinuosa</i>		Species of Special Concern		Mostly breeds and winters in wet meadows, fresh emergent wetland, and saline emergent wetland habitats. Requires thick and continuous cover to the water line in saltmarsh. Taller vegetation (tules and cat-tails) for nesting.	yes	Known CNDDDB occurrences
Bald eagle <i>Haliaeetus leucocephalus</i>	Threatened	Endangered		Found along ocean shores, lake margins, and along rivers. Need large platform trees for nesting.	no	none
Loggerhead shrike <i>Lanius ludovicianus</i>				Found in a variety of habitats including woodlands, savannah, pinyon-juniper, riparian woodlands.	yes	moderate
California black rail <i>Laterallus jamaicensis coturniculus</i>		Threatened		Mostly inhabits salt-marsh habitat bordering large bays.	yes	Known CNDDDB occurrences

Table 3.8-1: Special Status Species with the Potential to Occur within the City of Petaluma General Plan Planning Area

Species Name	Federal	State	CNPS ⁽³⁾	Habitat	Habitat Present	Potential for occurrence within Study Area
Marbled godwit <i>Limosa fedoa</i>				Prefers native prairie with marshes or other wetlands nearby. During migration, they can be found in and around nearly any aquatic environment.	yes	moderate
Lewis' woodpecker <i>Melanerpes lewis</i>				Found in ponderosa pine forest, open riparian woodland dominated by cottonwood, and logged or burned pine forest; however breeding birds are also found in oak woodland, nut and fruit orchards, pinyon pine-juniper woodland, a variety of pine and fir forests, and agricultural areas including farm and ranchland. Important aspects of breeding habitat include an open canopy, a brushy understory offering ground cover and abundant insects, dead or downed woody material, available perches, and abundant insects.	no	none
San Pablo song sparrow <i>Melospiza melodia samuelis</i>		Species of Special Concern		Resident of salt marshes and sloughs in San Pablo bay.	yes	low
Long-billed curlew <i>Numenius americanus</i>		Species of Special Concern		Breeds in upland short grass prairies, and wet meadows.	yes	low
California clapper rail <i>Rallus longirostris obsoletus</i>	Endangered	Endangered		Found in salt-water and brackish marshes and associated with abundant growths of pickle-weed.	yes	moderate
Bank swallow <i>Riparia riparia</i>		Threatened		Nests primarily in riparian and other lowland habitats	yes	low
Black skimmer <i>Rynchops niger</i>				Nests on river delta shorelines, on gravel beaches with salt cedar	no	low
Rufous hummingbird <i>Selasphorus rufus</i>				Nests in berry tangles, shrubs, and conifers. Favors habitat rich with nectar producing flowers.	yes	moderate
Allen's hummingbird <i>Selasphorus sasin</i>				Inhabits mixed evergreen, riparian woodlands, eucalyptus and cypress groves, oak woodlands, and coastal scrub areas in breeding season.	yes	moderate
Red-breasted sapsucker <i>Sphyrapicus ruber</i>		Species of Special Concern		Found in woodlands at elevations throughout California. Preferred nesting habitats include montane riparian, aspen, montane hardwood-conifer, mixed conifer, and red fir, especially near meadows, clearings, lakes and slow-moving streams	yes	moderate
California least tern <i>Sterna antillarum browni</i>	Endangered	Endangered		This bird nests along the coast from San Francisco to Baja California.	yes	low
Northern spotted owl <i>Strix occidentalis caurina</i>	Threatened			Found in forested habitats containing some old growth characteristics.	no	none
Mammals						
Point Reyes mountain beaver <i>Aplodontia rufa phaea</i>		Species of Special Concern		Found in coastal areas near springs and seeps.	no	none
Pallid Bat <i>Antrozous pallidus</i>		Species of Special Concern		Roosts in rocky outcrops, cliffs, and crevices. Access to open habitats required for foraging.	yes	Known CNDDDB occurrences
Townsend's Big-eared Bat <i>Corynorhinus townsendii townsendii</i>				Well distributed throughout a variety of habitats (coniferous forests, oak woodlands, broad-leaf forests, grasslands, etc). Roosts in caves, buildings, tunnels, and other human structures (Williams 1986).	yes	low

Table 3.8-1: Special Status Species with the Potential to Occur within the City of Petaluma General Plan Planning Area

Species Name	Federal	State	CNPS ⁽³⁾	Habitat	Habitat Present	Potential for occurrence within Study Area
Greater western mastiff-bat <i>Eumops perotis californicus</i>		Species of Special Concern		Found in a variety of habitats including conifer forests and oak woodlands, grasslands, chaparral, and coastal scrub.	yes	low
Salt-marsh harvest mouse <i>Reithrodontomys raviventris</i>	Endangered	Endangered		Found only in saline emergent marsh wetlands. Primary habitat is in pickleweed.	yes	Known CNDDDB occurrences
<u>American Badger <i>Taxidea taxus</i></u>		<u>Species of Special Concern</u>		<u>Uses open areas with scattered shrubs and trees for cover and loose soil for digging.</u>	<u>yes</u>	<u>low</u>
Long-eared Myotis <i>Myotis evotis</i>				Found in all brush, woodland, and forest habitats from sea-level to 9000 feet.	yes	low
Fringed Myotis <i>Myotis thysanodes</i>				Found in a wide variety of habitats. Uses caves, mines, buildings, or crevices for roosts.	yes	low
Long-legged myotis bat <i>Myotis volans</i>				Most common in forest and woodland habitats above 4,000 feet in elevation.	no	low
Yuma myotis <i>Myotis yumanensis</i>				Optimal habitats are open forest and woodlands with sources of water for feeding.	yes	low
Suisun ornate shrew <i>Sorex ornatus sinuosus</i>				Found in tidal marshes above high tide mark.	yes	low
Point Reyes jumping mouse <i>Zapus trinotatus orarius</i>				Found primarily in bunch grass marshes, but also in coastal scrub, grassland and meadow habitats.	yes	low
Plants						
Franciscan onion <i>Allium peninsulare</i> var. <i>franciscanum</i>			1B	Grows on clay soils, often on Serpentine hillsides, in grassland and woodland habitat.	yes	Known CNDDDB occurrences
Sonoma alopecurus <i>Alopecurus aequalis</i> var. <i>sonomensis</i>	Endangered		1B	Inhabits wet areas, marshes, and riparian banks, and in riparian scrub.	yes	low
Napa false indigo <i>Amorpha californica</i> var. <i>napensis</i>			1B	Found in openings in the forest or woodlands, or in chaparral habitat.	no	low
Alkali milk-vetch <i>Astagalus tener</i> var. <i>napensis</i>			1B	Grows in vernal pools and in valley and foothill grassland areas.	yes	Known CNDDDB occurrences
Sonoma sunshine <i>Blennosperma bakeri</i>	Endangered	Endangered	1B	Vernal pools in valley foothill and grassland habitat	no	low
Salt marsh owl's clover <i>Castilleja ambigua ambigua</i>				Found in wetland habitats	yes	low
Sonoma ceanothus <i>Ceanothus sonomensis</i>			1B	Grows in chaparral areas with sandy, serpentine or volcanic soils.	no	low
Pappose tarplant <i>Centromadia parryi</i> ssp. <i>parryi</i>			1B	Found in coastal prairie, meadows and seeps, coastal salt marsh, valley and foothill grasslands, often on alkali sites.	yes	low
Sonoma spineflower <i>Chorizanthe valida</i>	Endangered	Endangered	1B	Grows on sandy soils in coastal prairie habitat.	yes	Known CNDDDB occurrences

Table 3.8-1: Special Status Species with the Potential to Occur within the City of Petaluma General Plan Planning Area

Species Name	Federal	State	CNPS ⁽³⁾	Habitat	Habitat Present	Potential for occurrence within Study Area
Point Reyes bird's-beak <i>Cordylanthus maritimus ssp. palustris</i>			1B	Found in coastal salt marsh habitats.	yes	Known CNDDDB occurrences
Soft bird's-beak <i>Cordylanthus mollis ssp. mollis</i>	Endangered	Rare	1B	Grows in coastal salt marsh habitats.	yes	Known CNDDDB occurrences
Yellow larkspur <i>Delphinium luteum</i>	Endangered	Rare	1B	Found in chaparral, coastal prairie, and coastal scrub habitats.	yes	Known CNDDDB occurrences
Dwarf downingia <i>Downingia pusilla</i>			2	Found in valley and foothill grasslands and vernal pools	yes	low
Round-leaved filaree <i>Erodium macrophyllum</i>			2	Found in woodlands and in valley and foothill grasslands.	yes	Known CNDDDB occurrences
Tiburon buckwheat <i>Eriogonum caninum</i>			3	Found in chaparral, grassland and coastal prairie habitats	yes	low
Fragrant fritillary <i>Fritillaria liliacea</i>			1B	Grows in coastal scrub and coastal prairie, and grassland habitat, sometimes on serpentine soils.	yes	low
Marine western flax <i>Hesperolinon congestum</i>	Threatened	Threatened	1B	Found in Chaparral and Valley and foothill grasslands	yes	low
Burke's goldfields <i>Lasthenia burkei</i>	Endangered	Endangered	1B	Grows in vernal pools and in meadow and seeps.	yes	low
Contra Costa goldfields <i>Lasthenia conjugens</i>	Endangered		1B	Often found in vernal pools, swales, and low depressions in grassy openings in woodland habitats.	yes	low
Legenere <i>Legenere limosa</i>			1B	Grows in vernal pools.	no	low
Sebastopol meadowfoam <i>Limnanthes vinculans</i>	Endangered	Endangered	1B	Found in wet meadows, vernal pools, and grassland habitats	yes	low
Jepson's linanthus <i>Linanthus jepsonii</i>			1B	Found in Chaparral and cismontane woodlands	yes	low
Marsh microseris <i>Microseris paludosa</i>			1B	Found in a variety of habitats from conifer forests, woodlands, coastal scrub and valley and foothill grasslands.	yes	low
Baker's navarretia <i>Navarretia leucocephala ssp. bakeri</i>			1B	Found in vernal pools, in alkaline soils. Also found in woodlands, grasslands and low elevation conifer forests.	yes	low
Petaluma popcorn-flower <i>Plagiobothrys mollis var. vestitus</i>			1A	Grows mostly in valley and foothill grasslands.	yes	Known CNDDDB occurrences
North coast semaphore grass <i>Pleuropogon hooverianus</i>		Threatened	1B	Usually found in wet grassy areas, in the shade. Generally associated with forested environments near meadows and seeps, and sometimes in freshwater marshes.	yes	low
Marin knotweed <i>Polygonum marinense</i>			3	Found in marshes and swamps.	yes	low

Table 3.8-1: Special Status Species with the Potential to Occur within the City of Petaluma General Plan Planning Area

Species Name	Federal	State	CNPS ⁽³⁾	Habitat	Habitat Present	Potential for occurrence within Study Area
Point Reyes cherkerbloom <i>Sidalcea calycosa ssp. rhizomata</i>			1B	Found in marshes and swamps	yes	Known CNDDDB occurrences
Showy Indian clover <i>Trifolium amoenum</i>	Endangered		1B	Found mostly in valley and foothill grasslands, and coastal bluff scrub. Sometimes found on serpentine soils.	yes	Known CNDDDB occurrences

Footnotes:

1. Endangered and threatened are a species status under the California or Federal Endangered Species Act, Federal species of concern and candidate species do not receive any statutory protection under the Federal ESA.
2. California Department of Fish and Game. Species designated as Species of Concern by CDFG are to be mitigated for under CEQA. A protected designation indicates that these species are fully protected under the Fish and Game Code and cannot be taken or possessed without a permit from the Fish and Game Commission or CDFG.
3. California Native Plant Society. Species on List 1A are believed to be extinct within California. Species on List 1B are rare or endangered in California and elsewhere in their range.

Likelihood of Occurrence Evaluations:

A rating of "known" indicates that the species has been observed on the site.

A rating of "high" indicates that the species has not been observed, but sufficient information is available to indicate suitable habitat and conditions are present on-site and the species is expected to occur on-site.

A rating of "moderate" indicates that it is not known if the species is present, but suitable habitat exists on-site.

A rating of "low" indicates that species was not found during biological surveys conducted to date on the site and may not be expected given the species' known regional distribution or the quality of habitats located on the site.

A rating of "none" indicates that the taxa would not be expected to occur on the project site because the site does not include the known range or does not support suitable habitat.

Sources:

CNDDDB (California Natural Diversity Data Base), 2001. Commercial version, information dated 7/01/2005. California Department of Fish and Game

Jennings, M.R. and M.P. Hayes, 1994. Amphibian and reptile species of Special Concern in California. Final Report, Inland Fisheries Division, California Department of Fish and Game. 255 pp.

Williams, D.F., 1986. Mammal species of Special Concern in California. Administrative Report 86-1, Wildlife Management Division, California Department of Fish and Game. 112 pp.

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75 E

Comment: Glossary comment – rewrite definition of ‘wildlife corridors’.

Response: Agree, definition rewritten in both FEIR and General Plan 2025 documents.

✓

The definition of Wildlife Corridor in the Draft EIR Glossary (G-1) is revised to read as follows:
Wildlife Corridor: A primary means for linking fragmented wildlife habitat areas, allowing species to move between otherwise isolated areas. Especially important for migratory animals and animals with large home ranges. Contributes to maintaining biodiversity, population interbreeding and continuation of species, and accessing other habitats.

75 F

Comment: Consider inclusion of narrative in historic preservation element regarding the rich agricultural historical heritage in the Paula Lane area of West Petaluma.

Response: The protection of agricultural heritage is addressed through both the proposed Historic Preservation element (Section 3.2 in the Draft GP) and the policies contained in the West Hills Subarea (Section 3.3 in the Draft GP)

76 A

Comment: Request that the City web-site inform the public of existing and proposed land use designations.

Response: Done; the list is posted on the City website at <http://xara1-4.ci.petaluma.ca.us/2025gplu/>

76 B

Comment: Provisions of communications regarding the Hummel properties to the Planning Commission.

Response: Copies of submitted documents were provided to the Commission.

77

Comment: Acknowledgement from the State of California, Office of Planning and Research regarding compliance with Clearinghouse review requirements for Draft EIR.

Response: Cover letter acknowledged, response to attached correspondence is identified in 77A through 77K.

77 A

Comment: State Department of Aeronautics – Draft EIR did not include the provision to incorporate the Petaluma Airport Land Use Plan.

Response: General Plan Section i.6 will be updated to include the reference to the Petaluma Airport Land Use Plan. In addition, policies and programs are included in the Health and Safety Element.

77 B

Comment: New development within the Airport’s 65 dB corridor

Response: Figure 13-6 in the General Plan shows the noise contours associated with the Petaluma Municipal Airport. Figure 2.4-1 in the Draft EIR shows the proposed land use classifications for General Plan buildout. The proposed uses within the 65 dB CNEL contour include open space and public/semi-public uses. Residential uses are not proposed within the 65 dB CNEL contour as per the commenter’s assertion. However, as discussed on page 3.1-21 of the Draft EIR, single-family residential uses are proposed within a mile of the airport and fall within the 55 and 60 dB CNEL contours. Any new residential uses proposed in this area would be required under the Comprehensive Airport Land Use Plan to meet certain compatibility criteria, including implementing measures that would reduce noise levels by at least 25 decibels. General Plan Policies 10-P-8 and 10-P-9, listed below, would further mitigate impacts to noise-sensitive uses and would insure consistency with state policy.

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10-P-8: Discourage location of new noise-sensitive uses, primarily homes, in areas with projected noise levels greater than 65 dB CNEL. Where such uses are permitted, require incorporation of mitigation measures to ensure that interior noise levels do not exceed 45 dB CNEL.

10-P-9: Ensure that the City's Noise Ordinance and other regulations:

- Require that applicants for new noise-sensitive development in areas subject to noise levels greater than 65 dB CNEL obtain the services of a professional acoustical engineer to provide a technical analysis and design of mitigation measures.
- Require placement of fixed equipment, such as air conditioning units and condensers, inside or in the walls of new buildings or on roof-tops of central units in order to reduce noise impacts on any nearby sensitive receptors.
- Establish appropriate noise-emission standards to be used in connection with the purchase, use, and maintenance of City vehicles.

77 C

Comment: Height of buildings, particularly within airport approach zones.

Response: The Draft General Plan is consistent with the height limits identified in the Sonoma County Comprehensive Airport Land Use Plan (LUP). The Draft EIR (on page 3.1-21) did make reference to Impact 3.1-2, which is an assessment of the compatibility of proposed General Plan land uses with the Comprehensive Airport LUP. Due to a formatting error, this analysis was inadvertently omitted from the Draft EIR text, see revised text below.

In addition, the adopted Petaluma Airport Master Plan and Land Use Plan will be utilized as criteria for any development proposed within inner and outer approach zones.

✓ The following text is added at the end of page 3.1-23 to correct this omission, and which addresses the comment:

Impact 3.1-2 Development proposed under the General Plan would comply with all development standards in the Sonoma County Comprehensive Airport Land Use Plan. (Less than Significant)

The Comprehensive Airport Land Use Plan limits the land uses, building heights, and population densities that can be located within airport referral area boundaries. Under the Proposed General Plan, new development within the Comprehensive Airport Land Use Plan referral area boundary would be required to comply with all Comprehensive Airport Land Use Plan development standards according to General Plan Policy , which reads as follows:

5-P-52.B.: Future land uses in the airport area are to be compatible with airport use, including compliance with the County's Comprehensive Airport Land Use Plan for Sonoma County.

Although land use classifications in the General Plan do not generally specify height limits, massing and other development standards at a level of detail necessary to ensure compliance

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with the Comprehensive Airport Land Use Plan, any development proposed under General Plan buildout would be assessed for compliance with the precise standards of the Comprehensive Airport Land Use Plan in a subsequent environmental review process. Moreover, following adoption of the General Plan and Policy 5-P-52.B, the City's zoning designations, which are part of the Municipal Code, would be reviewed and updated, as necessary, to ensure compliance with Policy 5-P-52.B and the Comprehensive Airport Land Use Plan.

- 77 D** **Comment:** Concern with possible new school sites within 2 miles of runway.
Response: No new school sites are proposed within 2 miles of the existing Petaluma Airport runway.
- 77 E** **Comment:** The FAA recommends that landfills, wetlands, surface mining, and other uses that have the potential to attract wildlife, be restricted in the vicinity of the airport.
Response: The City of Petaluma is already implementing this recommendation as part of its compliance with the City's Airport Land Use Plan (ALUP), and as affirmed by Mobility policy: "5-P-52.B. Future land uses in the airport area are to be compatible with airport use, including compliance with the County's Comprehensive Airport Land Use Plan for Sonoma County,".
- 77 F** **Comment:** California PUC regulations require that CalTrans review and comment on findings of a local government when it intends to overrule an ALUC.
Response: The airport is protected from encroachment of inappropriate land uses through the designation of Urban Separator and Open Space for the approach zones. Compatible land uses within the Airport PCD are assured through the Airport Master Plan and design regulations. The City of Petaluma recognizes the review and comment role of Caltrans in relation to City recommendations for overriding the ALUC for the Petaluma Municipal Airport. The City will continue to seek to minimize its residents' exposure to excessive noise and potential safety hazards within specific safety zones around the municipal airport by preventing incompatible uses as part of its compliance with the ALUP.
- 77 G** **Comment:** The General Plan does not include specific plans for development project(s) in the redevelopment area and does not discuss whether separate environmental reviews will be performed for future development projects and the approval process that will follow. The Draft EIR states on page 3.13-2 that reuse and intensified use of formal Industrial and commercial has the potential to expose hazardous materials during demolition or excavation and that remediation of these hazards is necessary before rehabilitation or construction can begin. However, the Draft EIR concludes that there are no Cortese sites within the planning area. Thus, buildout under the General Plan would not result in new development being located on hazardous materials sites. DTSC's databases indicate that there are currently four sites located in Petaluma.
Response: The purpose of the General Plan is not to identify specific development plans or projects, but rather to "provide strategies and specific implementing policies, programs, and actions" and to establish "a basis for judging whether specific development proposals and public projects are in harmony with Plan policies and standards." (page 1-1 of the Draft EIR). CEQA

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requires that the agency with the primary responsibility over the approval of a project, i.e. the lead agency, evaluate the potential environmental impacts of a proposed project, in this case, the General Plan. Future development projects requiring the City of Petaluma approval will be subject to independent environmental impact analysis tiered off of the General Plan EIR. Accordingly, Chapter 1 (Introduction) indicates that the EIR has been prepared as a programmatic EIR to be used “be used as a reference for subsequent environmental review of specific plans, infrastructure improvements, zoning amendments, impact fees, and development proposals” (page 1-3).

The referenced sentence on page 3.13-2 of the Draft EIR is changed to read, “Reuse and intensified use of former industrial and commercial areas, particularly in Central Petaluma, has the potential to expose one or more unreported hazardous materials during demolition and/or excavation.” Although four sites are reported on the website provided, three of these sites are only listed as project sites and does not have corresponding entries on the Hazardous Wastes and Substances (Cortese) Site List. The one site listed on the Cortese List has been added to the text of the Draft EIR.

Separate CEQA review processes will be completed for future developments within the planning area that require City approvals. Therefore, unreported hazardous materials will be identified and remediated during individual project planning and permitting processes. In addition, the City is partnering with the EPA to assess potential brownfields properties within the planning area, as noted on page 10-11 of the Draft General Plan, and is working with developers, non-profit organizations to clean up them up.

To effectively and comprehensively address this comment, Policy 10-P-14, was provided in Chapter 10, the Health and Safety Element of Draft General Plan. It will help ensure that unidentified hazardous wastes are identified and remediated during project development:

10-P-14 Prepare and maintain an inventory of environmentally contaminated sites to educate future landowners about contamination from previous uses. Work directly with landowners in the cleanup of these sites, particularly in areas with redevelopment potential.

✓

The referenced sentence on page 3.13-2 of the Draft EIR is changed to read, “Reuse and intensified use of former industrial and commercial areas, particularly in Central Petaluma, has the potential to expose one or more unreported hazardous materials during demolition and/or excavation.”

77 H

Comment: State Dept. of Forestry and Fire Protection. The City currently has two areas at the south end of the community identified as Very High Fire Hazard Severity Zone. The General Plan should include planned regular intervals to re-evaluate City lands designated as such.

Response: General Plan Program has been added as follows: 7-P-27 E. Conduct regular re-evaluation of City-lands designated as Very High or High Fire Hazard Severity Zones.

77 I

Comment: Table 3.2-5 on page 3.2-9 (Intersection Level of Service, Existing Condition): the table shows that the McDowell Blvd/East Washington Street intersection operates at level of service (LOS) D during the PM peak hour under existing conditions. Based on our studies, the intersection is currently operating at LOS F and heavily influences operation of the northbound and southbound ramp intersections. In 2020, this impact can be expected to be

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more severe. The only planned projects for Washington Street are the East Washington Street interchange improvements, as shown in Figure 3.2-4 and listed on page 3.2-22. The McDowell Blvd/East Washington Street intersection would continue to operate poorly without providing mitigation measures on McDowell Blvd and East Washington Street east of this intersection. The impacts would also adversely affect operations of adjacent intersections.

Response: Improvements to East Washington Street are included in the Proposed Plan, to upgrade and realign existing freeway ramps and provide an additional ramp to Northbound 101, which will improve operations at the McDowell Boulevard / East Washington intersection. Furthermore, the inclusion of the Rainier extension and interchange in the Proposed Plan is intended to provide an alternate route to serve as a reliever for East Washington Street.

The DEIR provides a planning-level analysis of traffic operations on East Washington Street that is appropriate for evaluating the impacts of development under the Proposed Plan. As noted in the DEIR, there are several closely spaced intersection on East Washington Street that often experience queuing between intersections, which may result in future operations at a worse level of service than is captured by traditional LOS analysis. The City of Petaluma conducted a prior analysis of existing conditions at the McDowell Boulevard / East Washington Street intersection that included a micro-simulation analysis to evaluate the effects of the queuing and determine whether intersections are able to accommodate peak demand (*East Washington Street / US 101 Interchange Analysis of Alternatives*, Fehr & Peers, October 2006). The prior analysis found that the McDowell Boulevard/East Washington Street intersection serves 95% of peak demand and currently operates at LOS D during the PM peak hour.

Future conditions in 2020 are expected to result in additional delay on East Washington Street, with or without the Proposed Plan. This is reflected in the DEIR: on Figure 3.2-7, the LOS results for intersections on East Washington Street are accompanied by a footnote explaining that queuing between intersections would affect operations, resulting in additional delay that may not be captured by traditional LOS analysis. This condition would not trigger an impact based on the City's LOS criteria. Ultimately, further decisions on whether to expand capacity or provide further motor vehicle improvements to East Washington Street will need to be balanced with the goals, policies and Guiding Principles of the Proposed Plan, which call for a greater emphasis on travel by modes such as walking, bicycling, or transit.

Mitigation: In order to codify this policy with regard to automobile level of service (LOS), Policy 5-P-10 of the Proposed Plan has been amended to include the following:

Policy 5-P-10: Maintain an intersection level of service (LOS) standard for motor vehicle circulation that ensures efficient traffic flow and supports multi-modal mobility goals. LOS should be maintained at Level D or better due to traffic from any development

- A. A lower Level of Service may be deemed acceptable, by the City, in instances where the City finds that potential vehicular traffic mitigations (such as adding additional lanes or modifying signal timing) would conflict with the Guiding Principles of the General Plan, particularly with regard to:*

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- *Guiding Principal #2. Preserve and enhance Petaluma's historic character.*
- *Guiding Principal #6. Provide a range of attractive and viable transportation alternatives, such as bicycle, pedestrian, rail and transit.*
- *Guiding Principal #7. Enhance Downtown by preserving its historic character, increasing accessibility, and ensuring a broad range of business and activities and increasing residential activities.*

The above does not relieve any need to mitigate development related impacts, which may include multi-modal improvements to reduce identified impacts.

77 J

Comment: The DEIR should also include AM peak hour analyses of US 101.

Response: The AM Peak Hour volumes were analyzed in the preparation of the DEIR; PM peak hour volumes were higher, therefore used for discussion of impacts.

√

See Revised Table 3.2-8 (corrected to illustrate V/C and volume numbers in correct column) and added Table 3.2-8.a. illustrating AM Peak Hour.

77 K

Comment: Table 3.2-6 on page 3.2-11 (Freeway Peak-Hour V/C Ratio and Existing LOS) and Table 3.2-8 on page 3.2-30 (Freeway Peak-Hour V/C Ratio and LOS Summary):

- The LOSs and V/C ratios shown are not reflective of realistic freeway operations. The Department's general practice for freeway operational analysis is to identify bottleneck locations and their associated delays, and use constrained volumes to determine LOSs or V/C ratios. Under this practice, a V/C ratio on a roadway segment will not exceed 1 (which indicated that a roadway segment operates at LOS E, or there is a bottleneck when V/C=1). V/C ratios greater than 1, as indicated on the tables, will never occur in reality.
- Using theoretical capacity of 2,200 vehicles per hour per lane (vphpl) is too high in the study area. Our study shows existing capacities are much lower than 2,200 vphpl.
- Table 3.2-8 uses volumes/theoretical capacity as V/C ratios. For mixed flow traffic on any roadway segment, this ratio should be higher because there would be less traffic in an HOV lane than in a mixed flow lane.
- Table 3.2-8: The numbers in the columns "Theoretical Capacity" and "Volumes" under Existing Conditions should be reversed.

Response:

- The existing volume information was taken from the *CalTrans Traffic Volumes on California State Highways* (2003). This data source did not identify the need to constrain the published volumes.
- An explanation of the rationale for assuming the capacity of 2,200 vphpl is provided in the DEIR. As detailed on 3.2-3, the theoretical capacity used in the General Plan analysis was derived using the Highway Capacity Manual (Transportation Research Board, 2003) methodology. Existing volume information, taken from the *CalTrans Traffic Volumes on California State Highways* (2003), indicates northbound volumes in the PM peak hour that *exceed* the theoretical capacity of 2,200 vphpl. Therefore, the

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theoretical capacity is higher than 2,200 vphpl and not lower. Therefore, by evaluating freeway operations based on the capacity of 2,200 vphpl, the DEIR provides a conservative analysis.

- Table 3.2-8, as identified in the footnote, assumes freeway capacity of 2,200 vehicles per hour per lane (existing and future conditions) and 1,100 per hour per HOV lane (future conditions only).

The EIR has been updated to correct the text error in Table 3.2-8.

✓ **Table 3.2-8, Freeway Peak-Hour V/C Ratio and LOS Summary (DEIR PAGE 3.2-30) is corrected, see attached list and table.**

78 **Comment:** Kelly Creek, privately owned, maintenance concerns.

Response: see Response 6.

79 **Comment:** City of Rohnert Park – concern with regional transportation, proportionate fair share of CIPs. Expand 5-P-12 to include share of regional improvements.

Response: See Response 93.C. for Policy amendments.

80 **Comment:** Questioned Retail Sales Tax Leakage Study, did not support big box retail.

Response: Comment noted. A number of the specific stores noted in the comment letter (i.e.: Pottery Barn) do not actively pursue sites within a market area the size of Petaluma.

81 **Comment:** Desire to retain southern entrance to City at Petaluma Boulevard South as is, keep small businesses and houses; no large retail malls.

Response: Comment noted. The land use designations at the south entrance were retained to facilitate the continued success of the River-dependent businesses.

82 **Comment:** Recommended General Plan text amendments.

Response: Staff and the Planning Commission worked through the recommended changes to General Plan text outlined in the Sept. 30, 2006 letter from the Petaluma Small Craft Center Coalition. Based on Commission direction amendments were made to goals, policies, and programs in the Land Use, Community Character, Mobility, Parks and Recreation, and Community Facilities elements of the Draft General Plan.

83 **Comment:** Wants to see 100' Urban Separator along all properties along Paula Lane rather than Urban Separator pathway as proposed.

Response: The concept of an Urban Separator at a prescribed width in this area is problematic due to existing development and lot sizes. For example a 100' Urban Separator could encumber a majority of or an entire parcel rendering it either undevelopable or nonconforming. The Urban Separator Pathway designation denotes the community's desire to develop a ring trail at the City's edge either through fee title dedication of land or through access easements across properties.

84 **Comment:** same as Comment 83.

Response: Refer to Response 83.

85 **Comment:** Questioned assumptions of Corps of Engineers assessment.

Response: The Corona Road bridge was designed to accommodate the 100-year storm flows.

Response

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86		See response 42 C regarding Corps assumptions. Comment: Support for provisions to allow harvesting of rainwater. Response: See Response 37.I.
87		Comment: Support for provisions to allow greywater systems. Response: See Response 37 I.
88 A		Comment: Emergency water supply if cut off from Sonoma County Water Agency. Response: Temporary loss of the SCWA transmission line is addressed by existing procedures to implement emergency water supply rationing and distribution of City water supplies (groundwater).
88 B		Comment: Should expand Water Conservation Program. Response: Comment acknowledged, work has been ongoing concurrently with the General Plan and EIR work effort. The Water Conservation Program, adopted January 2008; this document includes expanded BMPs.
88 C		Comment: Recommend retrofitting, using PAYS system. Response: Retrofitting is a component within the expanded Water Conservation Program, although utilization of a specific system is not required.
88 D		Comment: Support for approval of rainwater harvesting systems. Response: See Response 37.I.
88 E		Comment: Support for a pilot program for both residential and commercial applications of greywater systems. Response: See Response 37 I.
89 A		Comment: Casino impacts on local and regional traffic congestion. Response: See Master Response D.
89 B		Comment: Casino impacts to demands for water supplies from SCWA water sources. Response: See Master Response D.
89 C		Comment: Casino impacts to increased wastewater discharges. Response: See Master Response D.
89 D		Comment: Casino impacts to groundwater pumping. Response: The City's planned use of groundwater projected to 2025 is within the historical range of groundwater pumping by the City of Petaluma. No increase over this historical range of pumping is planned. The City will not be providing water service to the proposed Graton Rancheria Casino. Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 2 Appendix C, Water Supply and Demand Analysis Report (June 2006) and Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).
89 E		Comment: Casino impacts to demands for regional Hwy 101 capacity that would conflict with retail, commercial, job and residential growth predicted by General Plan. Response: See Master Response D.
89 F		Comment: Casino impacts on increased emergency and health care needs, increased crime,

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police and fire calls.

Response: See Master Response D. Petaluma has made its opposition clear to casino development through In part through a November 2006 ballot measure overwhelmingly approved by the people of Petaluma. However, the two casinos discussed in recent years are outside of the City's jurisdictional boundaries and are not subject to local land use approvals or CEQA. Environmental studies of some of the impacts commented for the Graton Rancheria project in proposed for Rohnert Park are underway pursuant to the National Environmental Protection Act ("NEPA"), but to date the nature and intensity of the project has not been determined. Petaluma will not be providing emergency, public safety or utility services to the casino, if built. While the casino has been included in Petaluma's consideration of cumulative traffic impact to the extent possible at this time (See Master Response D), the General Plan DEIR is not required to engage in a more detailed evaluation of economic and social impacts of the type suggested here, which do not relate to physical changes in the environment and are not caused by the City's project. CEQA Guidelines section 15064(d)-(e).

89 G **Comment:** Casino impacts on low-income housing demand.

Response: See Response 89 F and Master Response D.

89 H **Comment:** Casino impacts on sales tax shifts to casino owned businesses.

Response: See Master Response D.

89 I **Comment:** Casino impacts on increased regional and local air/water pollution.

Response: In Section 3.6, the Draft EIR concludes that potential water quality impacts from General Plan buildout are expected to be controlled under proposed General Plan policies, thus water quality impacts would be less than significant. This would also be true under the cumulative scenario. With regard to the cumulative air quality assessment, the Draft EIR determined that the proposed General Plan's compliance strategies would enable the City to adhere to the relevant air quality thresholds, resulting in a less-than-significant impact under CEQA. See also Master Response D.

89 J **Comment:** Casino impacts on increased local and regional green house gas emissions.

Response: The Revised DEIR identifies a significant and unavoidable impact from cumulative global climate change impacts. This conclusion would not change with the addition of the Graton Rancheria casino, even assuming the impacts of casino or business park on the Rohnert Park site were not too speculative for cumulative analysis. As noted in Master Response D, the Dry Creek Rancheria Band proposal for land south of Petaluma is too speculative to require inclusion in the cumulative impact analysis for the General Plan FEIR.

89 K **Comment:** Casino impacts on increased wear and tear on local roads and public facilities.

Response: The Graton Rancheria project is proposed for a site outside Petaluma's jurisdictional boundaries by a sovereign tribe, and therefore is not subject to any City-imposed approvals or conditions to mitigate possible impacts. It is presently unknown whether any of the identified development alternatives may eventually be implemented, and whether they will include a casino or business park development, or what the timeline for any development may be.

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89 L

Comment: DEIR should be recirculated as a revised focused draft to address cumulative casino impacts.

Response: Comment noted. See Master Response D and Responses 89A-F. Court decisions on recirculation confirm that the standard for recirculation under CEQA is stringent. *Laurel Heights improvement Ass'n.v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112 (“*Laurel Heights II*”). Recirculation is only required when the addition of new information to a DEIR “deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect...” that the City has declined to implement. *Laurel Heights II*, 6 Cal. 4th 1112, 1129. It was determined that an analysis of greenhouse gas emissions and climate change was required, that this analysis added significant new information and a potentially significant new impact, and a Revised DEIR was created and recirculated to include that information. The remaining comments, responses and information added to the DEIR do not contain or identify a new significant environmental impact or a substantial increase in the severity of an impact that would result from the project, the City’s General Plan 2025. Similarly, the City has no ability to approve mitigation measures that might reduce any future impacts from a casino project in Rohnert Park, which at present are speculative, and therefore the FEIR does not identify feasible mitigation measures which might reduce future speculative casino impacts, but which are not adopted by the City.

90 A

Comment: Suggested changes to G-P-13 regarding Lafferty Ranch, separating the regional park from Tolay Ranch into two separate policies.

Response: The development of Lafferty Ranch as a regional park is identified within the DEIR Policy 6-P-13; changes are noted to separate the issues of Tolay Ranch, proposed by the Sonoma County Parks Department, and Lafferty Ranch.

✓ DEIR pages 3.3-14 is amended to illustrate the separation of the Lafferty Ranch and Tolay Ranch in separate policies (also see General Plan Policies 6-P-14 and 6-P-15.D; Table ES-5 is amended accordingly and the Figure 3.3-1 is amended to reflect the existence (out of the area shown on the exhibit) of Lafferty Ranch. Tolay Ranch is out of the Planning Referral Area and is referenced in General Plan text.

90 B

Comment: Figure 3.3-1 in DEIR excludes Lafferty.

Response: See response 90.A.

90 C

Comment: Notation that an EIR for Lafferty Ranch to allow public access was certified in 2001.

Response: Comment noted; although the EIR was certified, no action was taken to approve the project; see response to 90.A.

✓ Page 3.3-12 is amended to add the sentence: An EIR for the development of Lafferty Ranch as a public access amenity was certified in 2001. No action to approve the project evaluated in that EIR was taken, and the General Plan 2025 and its DEIR do not approve an access project.

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91 A

Comment: Will the Petaluma area receive more or less rainfall in the future? We cannot ignore predictions of sea level rise. At a minimum, the plan should discuss its assumption that sea level rise is not considered in the planning horizon. Far preferable would be contingency planning, such as preventing building on flood prone areas and a systematic retreat from low elevation areas that are already built upon.

Response: The probability of exceeding of a particular rainfall depth is computed based on historical rainfall records. Extrapolating more or less rainfall in the future based on global climate models is not recommended due to the unproven prediction capabilities of these models. See the response to comment 68C.

91 B

Comment: Comment on global climate change and fossil fuel scarcity.

Response: This comment was submitted prior to circulation of the *Air Quality – Greenhouse Gas Emissions Draft EIR* (November 2007). Refer to the Revised Draft EIR for the analysis on greenhouse gas emissions and climate change. See Master Response C and Response 68C.

92

Comment: Being aware that the scope of the new General Plan only covers the next 20 years it is possible that the consultants for the Petaluma General Plan 2025 may at first glance consider such projections pertaining to the next 100 years as outside the scope of the new General Plan. Based on the San Francisco Bay Conservation and Development Commission (BCDC) report it is safe to assume, over the next 20 years we will most likely see an increase in the mean sea level between 2.4 and 7.2 inches (0.2 to 0.6 feet), which is significant. These issues should be addressed in the General Plan and DEIR.

Response: See response to comment 68C.

93 A

Comment: The Draft General Plan 2025 DEIR does not adequately address the traffic impacts on the County road network that will result from the General Plan 2025 goals, objectives and policies.

The Petaluma GP 2025 DEIR assumes that level of service standards established by the Sonoma County General Plan are not relevant because Sonoma County did not participate in an update of the 1995 Sonoma County Transportation Authority Congestion Management Plan. Sonoma County General Plan Policy CT-2a and Figures CT-2c and CT-2d establish level of service standards for the County road network. The Petaluma GP 2025 DEIR should use these standards when determining whether or not LOS standards are currently being met, and if future development under General Plan 2025 will meet these standards for traffic in the unincorporated County. In addition, even if the County LOS standards are already being met, the future City development will increase traffic in the unincorporated area. This impact should be identified and addressed through appropriate mitigation.

Response: The City of Petaluma provided land use information to Sonoma County for inclusion in the County's traffic model that was used by the County to evaluate potential traffic impacts resulting from the Sonoma County General Plan 2020. Therefore, impacts on County roads resulting from future growth in Petaluma have already been evaluated in the Sonoma County General Plan 2020 DEIR. The DEIR included a discussion of County roadways significantly impacted by development (Adobe Road, Main Street in Penngrove, Petaluma

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93 B

Boulevard and Petaluma Hill Road), and noted that growth in Petaluma will contribute to those impacts, which were identified as significant and unavoidable by the County.

Comment: The Petaluma GP 2025 DEIR assumes that Sonoma County's GP 2020 DEIR traffic analysis adequately considered impacts created by implementation of Petaluma GP 2025 policies and that additional study is not required. While the Sonoma County's GP 2020 DEIR considered regional impacts resulting from existing General Plan policies of the County and all nine Cities, it does not consider the distinct impacts from each jurisdiction. The GP 2020 DEIR specifically warns that "Without additional study, it is not possible to determine the extent to which the future congestion of city and county roadways would be the result of future land use and development within one jurisdiction or another". Additional studies are needed to assist in determining Petaluma's contribution to regional congestion, and policies should be added to GP 2025 that mitigate this impact through fair share funding by future development within the City.

Response: The City of Petaluma is not responsible for updating the Sonoma County *General Plan 2020 DEIR*. However, any additional studies undertaken by the County could use analysis data from the *General Plan Future with Project (Year 2025) Conditions* analysis to assist in determining the future congestion of county roadways.

93 C

Comment: Fair Share Funding of Regional Transportation Improvements: Implementation of policies in the Economic Health and Sustainability Element will strengthen the retail sector in Petaluma, encourage mixed-use development, and promote Petaluma's economic vitality. However, despite an assumed balance between jobs and housing in Petaluma, development within Petaluma will result in additional peak hour traffic since workers and residents will continue to travel into and out of the City and the surrounding area. The 2000 Census Transportation Planning Package shows 27,509 working residents and 28,430 jobs in Petaluma during 2000. Of these 28,430 jobs, 10,400 jobs were held by residents and 18,030 held by in-commuters, with the remaining 17,109 residents traveling outside Petaluma for employment. This results in almost 13 commuters for every 10 employed residents, creating a significant burden on the County road system. Sonoma County General Plan Policies CT-1c and CT-1e recognize the need for development of regional revenue sharing agreements to ensure that development within the Cities pays its fair share toward mitigating traffic impacts in the unincorporated portion of the County. Therefore, General Plan 2025 should include goals, objectives, and policies that commit the City to require that future development contribute its fair share of regional improvements to the County transportation system.

Response: Support the concept of identification of regional transportation needs and cooperative means to propose improvements. The following changes to Policy 5-P-12 will develop and implement fair share funding of regional transportation improvements:

Cooperate with local jurisdictions, County, State and Federal agencies toward identifying and implementing regional improvements to the network.

D. Work with CalTrans and the Sonoma County Transportation Authority (SCTA) to

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achieve timely implementation of programmed freeway and interchange improvements.

- E. Designate SCTA as the agency with the overall responsibility for regional circulation and transit coordination between the City and County.
- F. Work with the County and SCTA to develop and adopt regional/subregional fees and/or require allocate a fair share contribution to accommodate transportation demand created by new development.
- G. ~~Consider participation through a proportionate fair share, as deemed appropriate and feasible by the City, in mobility network improvements transitioning into and out of the City.~~

GP Text Modification: The General Plan 2025 will be updated to include changes to policy 5-P-12.

93 D

Comment: Figure CT-6h of the Sonoma County General Plan shows capacity improvements on Stony Point Road, Lakeville Road, and Old Redwood Highway, which are identified as primary arterials. Petaluma General Plan 2025 calls for capacity reduction on Ely Boulevard, McDowell Boulevard, and Petaluma Boulevard. We support capacity reductions that help “calm” city traffic as long as east-west routes such as Frates, Ely, Washington, McDowell are improved and made available to accommodate future cross town traffic. In addition, the City should include polices to work with the County to assure that efficient traffic flow is maintained between arterials and reduced capacity roadways.

Response: The Proposed Plan includes planned roadway improvements designed to accommodate cross-town and thru-town traffic. Nine planned roadway improvements identified on page 3.2-22 and shown in Figure 3.2-4. These projects include the Washington Street Interchange Improvements, the Rainier Avenue Extension and Interchange, and the Caulfield Lane Extension.

93 E

Comment: Coordinate updates to Bike Plan within the SCTA countywide Bicycle Plan. Policy 5-P-38 should be expanded to encourage coordination between the Petaluma Bicycle Advisory Committee and the SCTA Bicycle and Pedestrian Advisory Committee. Additionally, Policy 5-P-36 should require that updates to the Petaluma Bicycle Plan are coordinated with the SCTA Countywide Bicycle Plan.

Response: City staff has reviewed the SCTA Bike Map to ensure continuity between County and City bicycle facilities. In addition City staff has provided SCTA staff with the City’s GIS files depicting existing and proposed bicycle routes/facilities. The City will continue to coordinate efforts with SCTA. Staff will also make the above recommended changes to Policies 5-P-36 and 5-P-38 in the Draft General Plan.

Mitigation: Recommended changes to Policies 5-P-36 and 5-P-38 will be in the General Plan 2025 document.

93 F

Comment: Request for clarification of its surface water management policies regarding how city works with the county and other responsible agencies to reduce flooding.

Response: See Master Response B. In addition, the City is represented on the SCWA Zone 2A

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93 F.1

Advisory Committee to prioritize and implement regional flood protection and drainage improvement projects in the Petaluma River watershed. The City is also working closely with SCWA staff to further develop the XP-SWMM watershed model to gain a better understanding of the watershed drainage patterns and identify feasible solutions to reducing flood occurrences and flood depths.

Comment: “The DEIR does not analyze impacts to public safety, natural resources, road maintenance, and housing in unincorporated areas created by implementation of these policies.” (relating to 8-P-29, -30, 32 and -34 – creek maintenance and setback in unincorporated area).

Response: The referenced policies and programs support the Surface Water Management draft goal to “Provide surface drainage and flood protection facilities to meet the community’s needs.” The Plans referenced within this policies hold numerous requirements and regulations to respect existing physical constraints and/or natural habitats.

✓ DEIR Page 3.6-9 is amended relative to Policy 8-P-29 to accept recommended text changes to provide clarity and consistency with the Sonoma County Draft General Plan 2020, as follows:

Policy 8-P-29 The City of Petaluma, SCWA, Sonoma County and other responsible agencies shall be encouraged to work together in order to create and adopt a flood management plan, or plan amendment to the Petaluma River Watershed Master Drainage Plan (SCWA, June 2003), for the Petaluma River watershed implementing the following regional surface water solutions:

- A. Establish a creek corridor setback for the design and construction of a flood terrace system to allow Willowbrook, Marin, and Liberty Creeks to accommodate a 100 year storm event within a modified creek channel, to the extent possible given natural and physical constraints.
- B. Within a 200’ setback from centerline of the River (outside of City limits) and Willowbrook, Marin, and Liberty Creeks the City shall work with Sonoma County to create interim development standards for that setback area until such time as studies are concluded and approved by Sonoma County, the SCWA, the City of Petaluma, and other responsible agencies. Thereafter all lands affected shall set aside the necessary river and/or creek corridor areas and, as development occurs, shall undertake the identified surface water containment enhancement improvements to accommodate improvements envisioned in Program A, above.
- C. Working with Sonoma County, the City shall develop a plan and identify funding opportunities to acquire and remove existing structures within the regulatory floodway of the Petaluma River and its tributaries. The Plan shall be updated as needed to maintain consistency with changes in regulatory mapping of the floodway.
- D. Participate with the County in implementation of the regional components of the Petaluma River Watershed Master Drainage Plan (SCWA, June 2003), Petaluma River Floodplain Management Plan (City of Petaluma, October 2001, Petaluma River Access and Enhancement Plan (City of Petaluma, May 1006, Sonoma County General Plan 2020 (Public Safety Element) and the City of Petaluma General Plan 2025.

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8-P-30 The City of Petaluma shall work with SCWA to maintain the modeling tools necessary to evaluate development proposals and assist in the design of local and regional surface water management improvements.

- A. The watershed model, XP-SWMM or updates thereto, shall be maintained, in cooperation between the City and SCWA, to assist in the evaluation of development proposals and in the design of regional watershed improvements to reduce flood elevations.
- B. Proposed development applications may be charged a model update fee to cover costs associated with evaluating a specific proposal for project specific and cumulative impacts to the regional surface water system.

8-P-32 Areas within the Petaluma watershed, both inside and outside of the City of Petaluma, which are subject to periodic surface water inundation and containment, should not be modified in any manner to reduce the historic storage characteristics and capacity.

- A. The City will work with the County to ensure that zero net fill policies are enforced within the unincorporated area for areas within the regulatory floodplain of the Petaluma River and its tributaries.
- B. The City shall work with the County of Sonoma to prohibit placement of fill materials within those areas identified as having historic storage capacity, which have a detrimental impact on downstream flows, including the increase in peak discharge volumes in the downstream areas.
- C. On-site and off-site improvements, deemed necessary by the City of Petaluma, to reduce the surface water impacts associated with a specific development proposal shall be designed, constructed, and maintained in perpetuity at the cost of the development associated with said impacts.

Text amendments to Policies 8-P-28, 30 and 32 to reflect the above changes will also be incorporated into the General Plan.

93 G **Comment:** Clarification of 8-P-20 regarding impacts of septic tanks in proximity to wells.

Response: The regulation of septic tanks in the County area is under County agency jurisdiction. The policy relates to the preservation of groundwater quality and should not contain a specific separation standard.

94 A **Comment:** Casino impacts – Petaluma’s ability, or inability to cope with potential of two major public facilities with cumulative impacts.

Response: Refer to Master Response D.

94 B **Comment:** Casino impacts upon the city’s identity, character and sustainable building, including an escalating corrosion of the socio-economic strength of its households and citizens.

Response: Refer to Master Response D.

94 C **Comment:** Supportive of GP language that deters over-development of land zoned (designated) agricultural.

Response

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94 D		Response: Comment noted. Comment: DEIR seriously fails to adequately analyze projected traffic impacts and required mitigations. Second casino dramatic impacts traffic carrying capacity.
94 E		Response: Refer to Master Response D. Comment: Casino impacts to Recreation, Music, Parks & The Arts as citizens drawn to the illusive hope of instant “wins” at tribal casinos.
94 F		Response: Refer to Master Response D. Comment: Diversion of consumer disposable income and impacts to community facilities (i.e.: schools) to meet multi-lingual needs for imported workforce children.
94 G		Response: Refer to Master Response D. Comment: Water and wastewater systems impacts. Response: Neither proposed casino will receive water or wastewater treatment utilities from the City of Petaluma.
94 H		Comment: Economic health impacts to individuals, households, and the community; Disposable income is diverted from basic needs. Response: Refer to Master Response D.
94 I		Comment: Inadequate security and law enforcement jurisdiction. Response: The City of Petaluma has no law enforcement jurisdiction on land outside the City limits or on any tribal land.
94 J		Comment: Housing – subsequent over-crowding, inadequate housing availability and substantial neighborhood deteriorations. Response: Refer to Master Response D.
95 A		Comment: The California Environmental Quality Act (CEQA) requires that for each significant impact identified in the EIR, the EIR must discuss feasible measures to avoid or substantially reduce the significant environmental effects. The DEIR does not adequately identify or address the mitigation measures necessary to reduce the traffic impacts. Mitigation measures fail to provide sufficient certainty that new development will pay its fair share toward the necessary traffic improvements. These measures fail to identify how the City will collect additional funding for the necessary traffic improvements, the need for which is created by new development. Response: See Master Response F.
95 B		Comment: DEIR should be revised and recirculated to incorporate analyses to reflect the changes on land use designations for certain properties that were the subject of straw votes of the City Council. Response: Parcels recommended for change through the selection of the Preferred Land Use Plan (2004-2005) were analyzed in the framework of the Draft EIR. Straw votes during the Draft General Plan and DEIR hearing process related to those land uses, including the mixed use and commercial use designations mentioned by the commenter for the DSL site.. No new land use designations were selected which created significant new information or impacts or

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increased severity of environmental impacts related to land use. Recirculation is not required.

✓

See Summary of City Council Considerations of Land Use Map Designations (April 2007), attached.

95 C

Comment: Impacts associated with land use designation on the DSL site (Rainier @ McDowell).

Response: The land use designation for the subject site was retained at mixed use.

96 A

Comment: DEIR should state there is some uncertainty in agency's ability to provide a water supply to its contractors.

Response: The commenter states that "there is some uncertainty about the Agency's [SCWA] ability to provide a water supply water to its contractors, including the City, for the reasons described in the Agency's Urban Water Management Plan UWMP." The commenter's description of the SCWA UWMP is somewhat confusing, because it says the SCWA UWMP assumes construction of the Agency's Water Supply, Transmission and Reliability Project ("Water Project"), but also that the SCWA UWMP states that the Water Project will not be built. The commenter says the City should use the SCWA UWMP "allocation" rather than the "allocation set forth in the Restructured Agreement for Water Supply." The SCWA 2005 UWMP referred to in the comment continues to show the City's entitlement at 13,400 acre feet/year, and allotment under the Temporary Impairment MOU at 17.1 mgd. See, e.g., Table 4-1, p. 4-3, SCWA 2005 Urban Water Management Plan. Neither the County UWMP nor the commenter provides any other information as to the extent or timing of a future curtailment of supply, if any.

The City can not reasonably respond in a quantitative fashion or with analysis of the impacts of this type of unspecified and speculative future curtailment. The City has developed and approved its own UWMP, and all work on the General Plan Water Demand and Supply Analysis is in conformance with that study. In addition, the thrust of all of the City's efforts to identify and develop a water supply to serve General Plan buildout has been to identify sources other than increased use of SCWA water. Furthermore, as demonstrated in 2007, when voluntary conservation was requested by the SCWA from all its contractors, the City was able to and did reduce water use below the percentage reductions requested. The City has identified reasonable alternatives other than SCWA water to satisfy increased short and long term water demand. It has also provided General Plan policies and programs which require the City to ensure that adequate water supply is in place prior to or in conjunction with project entitlements. See General Plan Policies 8-P-4, 2-P-47.

SCWA supply is based on current entitlements to the City of Petaluma from SCWA. No other data was available to the City during preparation of the WD&SA report, and to use anything other than the current entitlement and agreement information would be unfounded, given the lack of other data. All work is in accordance with the City of Petaluma's 2005 UWMP. The work performed by the City of Petaluma under the Water Demand and Supply Analysis (WD&SA) project was based on water supply from SCWA of average day max month (ADMM)

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rate of 17.1 mgd and 4,366.42 MG. Petaluma's entitlement from SCWA is an average day maximum (ADMM) rate of 21.8 mgd and 4,366.42 MG (13,400 acre-feet) per fiscal year as outlined under the 11th Amended Agreement for Water Supply. Commencing in September 2001, the Water Contractors and SCWA agreed to negotiate a new water supply agreement. This agreement is currently in the final phase of approval. The new water supply agreement entitled, "Restricted Agreement for Water Supply" will replace the existing 11th Amended Agreement. Under the Restricted Agreement, the City of Petaluma's delivery entitlement will not change.

Although the City of Petaluma's ADMM entitlement is 21.8 mgd, SCWA is currently unable to meet this entitlement. In December of 1999, SCWA declared the system temporarily impaired and in March 2001 the Memorandum of Understanding (MOU) Regarding Water Transmission System Capacity Allocation during Temporary Impairment was executed. This MOU allocated a lower ADMM limit to Petaluma. The original MOU expired on September 30, 2005. In February 2004, the preparation of the new MOU began. The new MOU allocates a total of 92 mgd of available supply to all contractors. The City of Petaluma's ADMM allotment is 17.1 mgd. The new temporary impairment MOU will expire on September 30, 2008.

For planning purposes for future potable water supply needs, the WS&DA report assumed that the current annual entitlement from SCWA of 4,366.42 MG (13,400 acre-ft) per fiscal year as outlined under the 11th Amended Agreement for Water Supply will not change through buildout of the City's General Plan and that all potable water demand above this limit must be obtained from other sources. Similarly, the current SCWA ADMM allotment of 17.1 mgd as outlined in the MOU Regarding Water Transmission System Capacity Allocation During Temporary Impairment is assumed to remain constant within this work through buildout of the City's General Plan 2025.

96 B **Comment:** City should not assume that the Agency would be able to deliver the current allocation of 13,400 acre feet per year. The City should use the UWMP allocations, rather than the restructured agreement.

Response: See response 96 A.

96 C **Comment:** Local supply and recycled water projects should be identified and environmental impacts should be analyzed. Groundwater, if used, should be evaluated on the long-term sustainability of any affected groundwater basin.

Response: Comment acknowledged. The impacts of the City's planned implementation of the Water Recycling Expansion Program ("WREP") and the water conservation program are studied on a program level in the General Plan 2025 DEIR. The WREP is being further studied on a project level through preparation of a WREP DEIR, now in the final stages of drafting and expected to be ready for public review in the Spring of 2008. Approval of the WREP DEIR will precede any activities to acquire and construct the recycled water infrastructure necessary to carry out the program.

Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 2 Appendix C, Water Supply and Demand Analysis Report (June 2006) and Volume 4 Appendix F-2, Groundwater

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Feasibility Study (February 2004).

The City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 and is in accordance with the City's 2005 UWMP outlines the City of Petaluma's water demands and supply/offset sources through Buildout 2025. Per the WD&SA report, water supply will be accomplished through SCWA supply, City owned groundwater wells, recycled water potable offset, and water conservation potable offset. The supply quantities of each source within each year are outlined in Chapter 3 (Figures 3-9 and 3-10) and Appendix S of the WD&SA report. Preparation of a program level EIR for the Recycled Water program is currently underway. Only limited groundwater supply was identified within the WD&SA for use as potable supply starting in Year 2024 to maintain groundwater as an emergency/backup potable water supply source. The WD&SA report addresses the use of groundwater and discusses the long term impacts on the sustainability of the groundwater basin.

96 D

Comment: DEIR should evaluate the status of the City's implementation of Water Conservation Programs and incorporate as project components or as mitigation measures.

Response: The City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 and is in accordance with the City's 2005 UWMP develops the City's water conservation program as a critical part to water supply through potable water offset. The water conservation program selected was the most aggressive program evaluated within the WD&SA work and goes well beyond the Best Management Practices. The program identifies 266.3 MG/Y of long term sustainable potable water offset savings. The City's water conservation program is scheduled to begin in 2008. In addition, the City of Petaluma has adopted a Water Conservation Plan which will further increase water conservation. The administrative draft of the Water Conservation Plan shows cost effective potable water offset via water conservation of 484 MG/Year. This plan exceeds all past program goals for potable offset via water conservation identified by the City of Petaluma's under their WD&SA report and SCWA's combined Tier 1, Tier 2, and new development programs. Water conservation specialists Bill Maddaus was involved in the water conservation work conducted by SCWA and the City of Petaluma's WD&SA work and the City's Water Conservation Plan, adopted in January 2008.

96 E

Comment: DEIR should discuss ways in which peak summertime demands (both of GP implementation and in City's service area) can be reduced.

Response: Although the City of Petaluma's ADMM entitlement is 21.8 mgd, SCWA is currently unable to meet this entitlement. In December of 1999, SCWA declared the system temporarily impaired and in March 2001 the Memorandum of Understanding (MOU) Regarding Water Transmission System Capacity Allocation during Temporary Impairment was executed. This MOU allocated a lower ADMM limit to Petaluma. The original MOU expired on September 30, 2005. In February 2004, the preparation of the new MOU began. The new MOU allocates a total of 92 mgd of available supply to all contractors. The City of Petaluma's ADMM allotment is 17.1 mgd. The new temporary impairment MOU will expire on September 30,

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2008. For planning purposes for future potable water supply needs, the WS&DA report assumed that the current SCWA ADMM allotment of 17.1 mgd as outlined in the MOU Regarding Water Transmission System Capacity Allocation During Temporary Impairment is assumed to remain constant through buildout of the City's General Plan 2025. The City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 clearly identifies and plans that the SCWA's ADMM allotment of 17.1 mgd can not be exceeded through buildout. The reduction of summer time water use was a focus of the analysis and was accomplished through the use of recycled water and water conservation measures. See Figure 3-9 and Appendix S of the WD&SA report.

96 F **Comment:** Water customers have been requested to implement water conservation measures, recycled water projects and/or increase the use of local groundwater supplies immediately to reduce demand on SCWA transmission system throughout the summer (2007).

Response: The City of Petaluma met and exceeded the 2007 request for reduction by SCWA.

96 **Comment:** Given the uncertainty regarding the status of existing groundwater supplies, SCWA requests that entities using groundwater do so in a manner that promotes the long-term sustainability of groundwater basins in the County.

Response: see 96.C.

96 G **Comment:** Clarification of the connection of Policy 8-P-30 with Policy 3-P-28 and 3-P-29.

Response: See Response 93 F.1. The width of the Petaluma River Corridor was identified by evaluating the topography, flow volumes and velocity of storm events, and the ability to design and construct flood terraces to reduce localized flood depth and to implement the adopted Petaluma River Access and Enhancement Plan.

96 H **Comment:** Clarification within the text to identify which study is referred to in describing 8-P-30.

Response: The study would be done in cooperation with SCWA, utilizing the XP-SWMM for the Petaluma watershed to define a regional flood reduction project in the context of the existing Petaluma River Watershed Master Drainage Plan.

96 I **Comment:** Coordination is needed to determine the feasibility of such mutual maintenance of the Surface Water Management Model (XP-SWMM).

Response: Department of Water Resource & Conservation staff have begun discussions with SCWA regarding joint use and maintenance of the XP-SWMM model for the benefit of designing and constructing regional flood reduction improvements. This comment was submitted by SCWA before undertaking initial XP-SWMM runs for the region. Now that both parties have a better understanding of the model, agreement has been reached that it is mutually beneficial to have a third-party expert consultant involved in the maintenance of the model, at least for the time being.

96 J **Comment:** Request delineation of the areas inside and outside the City that are reported to be subject to periodic surface water inundation and containment.

Response: Refer to DEIR exhibit and **FEIR 3.6-5** (areas of water depth exceeding one foot) exhibit for areas of inundation. Maps of possible detention sites are identified in the Sonoma

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County Water Agency Petaluma River Watershed Master Drainage Plan (June 2003), Page 4-61.

96 K

Comment: Clarification of Policy 8-P-31A to include discussion of the two SCWA projects (Marin, Wilson & Wiggins Creek cleanup and Marin Creek/Denman Flats Drainage Study).

Response: It is inappropriate to reference routine maintenance projects within the context of a 20-year General Plan. Policy 8-P-31 has been expanded to recognize SCWA's ongoing effort to maintain or improve historic channel capacity.

General Plan text amendment: Policy 8-P-31A will be expanded to address the above discussion.

96 L

Comment: Clarification in regards to Policy 8-P-33.

Response: This Policy, now renumbered to 8-P-36, is supportive of the Goal to "Preserve the design conveyance capacity of the surface water drainage system". Additional wording will be added to Program 8-P-36 A to clarify "as appropriate given maintenance authority and responsibility".

96 M

Comment: Additional analysis with XP-SWMM may be necessary to further evaluate the possible flooding impacts. The assumption of saturated or nearly saturated may be misrepresentative of lower magnitude events. By modeling a saturated condition for existing conditions, the XP-SWMM model presents similar results to assuming a highly impervious surface for much of the watershed. Therefore, adding additional impervious surfaces for buildout conditions shows little impact. The analysis may not accurately assess how buildout conditions may affect flood frequency in the watershed.

Response: The watersheds that were adjusted during the calibration to nearly saturated conditions were primarily outside the City limits in sparsely developed watersheds. Therefore, the effect of development in the City was not overwhelmed by impervious surface assumptions. In addition, a sensitivity analysis was performed for the 2-year event, which indicated there was not a significant difference in flow or water surface elevation when comparing existing and buildout conditions.

96 N

Comment: The XP-SWMM analysis should clarify what assumptions have been made concerning the level of stream maintenance inside and outside the City limits. The XP-SWMM model should be reflective of current regulatory limitations of stream maintenance. The City is requested to clarify what stream projects outside of the City have been assumed as part of the XP-SWMM model. Does the buildout model assume that terracing projects on Marin, Liberty, and Willowbrook Creeks occur (there are potential environmental/regulatory limitations)? Please indicate how the city will pay for these projects.

Response: The model is based on existing conditions, and no other stream projects were assumed for the future other than those currently experiencing scheduled maintenance. Adjustments were made to reproduce the conditions during the New Year's Flood, such as high vegetation in the channel downstream of Corona Road, but the 100-year storm model is based on existing conditions. The buildout model does not include any terracing projects other than the lower Denman Reach upstream of Corona Road on Industrial Avenue which is part of the

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- existing conditions model.
- 97 A** **Comment:** General Plan must meet the Council goals of reducing Greenhouse Gas Emissions 25% of 1990 by 2015 for entire community.
Response: The Draft General Plan calls for the implementation of a mandatory Green Building Program under Policy 3-P-126. See Master Response C.
- 97 B** **Comment:** New or remodeling buildings must meet Green Design Principles; make it clear in the General Plan. A green design policy should be incorporated into the proposed General Plan.
Response: This comment suggests that the City implement a green building policy, aspects of which have been incorporated into the General Plan through a mandatory Green Building Program Policy 3-P-126. It should be emphasized, however, that the comment pertains to the merits of the proposed General Plan, while the purpose of the public review period under CEQA is to solicit feedback on the adequacy of the Draft EIR in characterizing the proposed General Plan's environmental impacts. The comment does not question the adequacy of the Draft EIR or introduce additional environmental impacts that could result from the proposed General Plan's implementation. The commenter's opinions are noted for their application to general plan policy or City ordinance.
- 97 C** **Comment:** General Plan should require that no store exceed 90,000 square feet. Require a Community and Fiscal Impact Report on all retail occupancies greater than 25,000 square feet.
Response: This is a General Plan comment rather than a DEIR comment. The City Council weighed the option of requiring Community Impact Reports (CIRs) and declined to require it within the text of the General Plan.
- 97 D** **Comment:** General Plan should consider possible impacts of future nearby casinos on local roads, City police and fire services, water availability, wastewater disposal, garbage service, crime and other services.
Response: See Master Response D.
- 97 E** **Comment:** Development must account for and maintain historic animal corridors so fencing and other barriers do not prohibit migration of small mammals and other animals.
Response: The development entitlement process includes evaluation of impact to local biological and natural resources, including animal corridors. Mitigations would be site-specific to the identified impact and need for reducing that impact to a level of insignificance.
- 97 F** **Comment:** Add prohibition against any further loss of ridgetop and hilltop access in our community.
Response: The Land Use, Growth Management, and the Built Environment element of the Draft General Plan already provides policies regarding the protection of prominent hillsides and ridgelines (Policies 2-P-16 and 2-P-17). In addition, the Community Development Department per Council direction is preparing a comprehensive update to the Development Code (zoning and subdivision regulations) with hillside/ridgeline preservation as a priority item to be addressed in implementing the new General Plan.

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98 A

Comment: Do big boxes really hurt the towns where they reside? Will probably not bring new net tax/revenue and will bring definite costs.

Response: This is a General Plan comment rather than a DEIR comment. The City Council weighed the option of requiring Community Impact Reports (CIRs) and declined to require it within the text of the General Plan. The issue of whether a big box retail establishment provides a positive impact to local economy is addressed through Policy 9-P-2 and the first program which implement the policy: Consider the need, when reviewing commercial development proposals over a specific size of building area per occupant, to obtain a fiscal/economic analysis, as a component of the project's entitlement process to identify impacts on Petaluma's economy, existing businesses, local workforce and city finances.

98 B

Comment: Do we have sufficient water supply for big boxes?

Response: The City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 is based on land use shown within the City's general plan for potable water customers. If the big box development is within the land use shown in the general plan and are within the areas to be served by with potable water by the City then their water supply and demands have been addressed within the WD&SA work. In general, warehouse type facilities use very little water per square foot and the exact use of the facility would need to be evaluated along with all potential water uses to determine its overall impact on water supply. In addition, the water conservation measures to be implemented in the City of Petaluma will also require new development to be water efficient.

99 A

Comment: Include sufficient facts to evaluate the pros and cons of supplying the water development under the General Plan will need. Cannot defer to preparation of a Comprehensive Water Supply Plan.

Response: The City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 includes development of water demands and supply/offset sources required to meet the potable water needs of the City's General Plan 2025's land use. The WD&SA report identifies potable water supply via SCWA, City owned groundwater wells, recycled water offset, and water conservation offset. The WD&SA report clearly identifies and evaluates how the shortfall of 772MG/Y and ADMM shortfall of 5.0 mgd from SCWA could be overcome utilizing City owned groundwater wells, recycled water offset, and water conservation offset. The South Transmission Project is for current reliability needs and is not necessary to meet the supply for the General Pan 2025. In addition, the City of petaluma adopted a Water Conservation Plan (January 2008) which will further increase water conservation (see Policy 8-P-18). The Water Conservation Plan illustrates cost effective potable water offset via water conservation of almost twice what was recommended in the WS&SA report.

The work performed by the City of Petaluma under the Water Demand and Supply Analysis (WD&SA) project was based on water supply from SCWA of average day max month (ADMM) rate of 17.1 mgd and 4,366.42 MG

Petaluma's entitlement from SCWA is an average day max month (ADMM) rate of 21.8 mgd

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and 4,366.42 MG (13,400 acre-feet) per fiscal year as outlined under the 11th Amended Agreement for Water Supply. Commencing in September 2001, the Water Contractors and SCWA agreed to negotiate a new water supply agreement. This agreement is currently in the final phase of approval. The new water supply agreement entitled, "Restricted Agreement for Water Supply" will replace the existing 11th Amended Agreement. Under the Restricted Agreement, the City of Petaluma's delivery entitlement will not change.

Although the City of Petaluma's ADMM entitlement is 21.8 mgd, SCWA is currently unable to meet this entitlement. In December of 1999, SCWA declared the system temporarily impaired and in March 2001 the Memorandum of Understanding (MOU) Regarding Water Transmission System Capacity Allocation during Temporary Impairment was executed. This MOU allocated a lower ADMM limit to Petaluma. The original MOU expired on September 30, 2005. In February 2004, the preparation of the new MOU began. The new MOU allocates a total of 92 mgd of available supply to all contractors. The City of Petaluma's ADMM allotment is 17.1 mgd. The new temporary impairment MOU will expire on September 30, 2008.

For planning purposes for future potable water supply needs, the WS&DA report assumed that the current SCWA ADMM allotment of 17.1 mgd as outlined in the MOU Regarding Water Transmission System Capacity Allocation During Temporary Impairment is assumed to remain constant within this work through buildout of the City's General Plan 2025. See also Response 144.

99 B **Comment:** Straw votes taken for various land use designations (i.e.: DSL proposed for community commercial at Rainier and North McDowell Boulevard). Land uses changed by straw vote must be reanalyzed under new land use designation.

Response: Per City Council direction, the land use designation for the subject site was retained as Mixed Use.

99 C **Comment:** Need Retail Impact Analysis for additional commercial sites. Can the City support the number of big boxes likely to occur on the DSL and East Washington Place sites.

Response: See Response 98 A.

99 D **Comment:** How will new retail uses impact the existing retail and traffic patterns.

Response: The transportation analysis that was performed for the *General Plan Future with Project (Year 2025) Conditions* scenario included data from the City of Petaluma Travel Demand Model, which forecasts traffic changes resulting from changes in land use. Among other things, the model is sensitive to the amount and location of retail land uses. Therefore, forecasted shifts in retail traffic, such as from existing retail to future retail uses, are captured within the model analysis.

100 **Comment:** Water Conservation BMP's and their effective relation to reduction of Greenhouse Gases and promotional information on the PAYS® system.

Response: Comment Noted. The subject of Greenhouse Gas Emissions is addressed through the recirculation of a focused Revised Draft EIR.

101 A **Comment:** There are yet more options for denser, infill housing to create neighborhoods.

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Policies should not just allow but mandate mixed use (residential above commercial).

Response: Comment noted; the densities were the subject of much public discussion during the General Plan workshops and hearings; mixed use is extensively used throughout the central area. There is substantial policy direction pertaining to potential strategies to encourage dense infill housing in the General Plan's Land Use Element (Chapter 2), and the new Chapter 12, "Climate Change." Neighborhood densities were the subject of considerable public discussion during the General Plan workshops and hearings and the policies in Chapter 2, Land Use, Growth Management and the Built Environment reflect the range of public input received. Mixed use zoning applies extensively throughout the central area. This comment is important for public discourse on the merits of the proposed General Plan; however, the purpose of the Draft EIR public review period is to solicit feedback on the adequacy of the Draft EIR in characterizing the proposed General Plan's environmental impacts. This comment does not directly apply to the adequacy of the Draft EIR.

101 B

Comment: Draft General Plan and DEIR do not include measurable programs and policies to reduce GHG emissions.

Response: The subject of Greenhouse Gas Emissions is addressed through the recirculation of a focused Revised Draft EIR. Please see the discussion within the Revised DEIR and policies included in the General Plan relating to GHG emission reduction. Also see Master Response C.

102 A

Comment: Regarding the voluntary participation in the Cities Trip Reduction Ordinance: How does this affect the Impacts and Proposed General Plan Policies that Reduce the Impact of 3.2-1? Increased motor vehicle traffic would result in unacceptable level of service (LOS) at study intersections, mitigations that include Transportation Demand Management programs to reduce peak-period trip generation, trip reduction credits, etc.

Response: See response 5 C.

102 B

Comment: Regarding the voluntary participation in the Cities Trip Reduction Ordinance: How does this affect the Impacts and Proposed General Plan Policies that Reduce the Impact 3.5-5? The proposed General Plan could cause a substantial increase in transportation energy consumption due to the projected increases in trips associated with future population and employment growth.

Response: Adoption of the Trip Reduction Ordinance is one measure intended to help the potential growth in vehicle trips, and the resulting levels of energy consumption. However, the Trip Reduction Ordinance is not intended to fully mitigate Impact 3.5-5, since the voluntary nature of the program limits the degree to which its effectiveness can be guaranteed. Additionally, because the efficacy of the Trip Reduction Ordinance will depend on the number of participants, it is difficult to quantify any reduction in energy consumption.

102 C

Comment: Buildout of the General Plan would result in population levels that could conflict with the Bay Area 2005 Ozone Strategy and Senate Bill 437 (February 1996).

Response: Policy 5-P-13 is discussed in the Draft EIR as a means of reducing the magnitude of Impact 3.10-1 (GP buildout conflicts with Bay Area Ozone Strategy). This policy reads as follows:

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Encourage existing major employers to develop and implement Transportation Demand Management programs to reduce peak-period trip generation.

This policy is not invalidated by Senate Bill 437 because the language of the policy suggests *voluntary* rather than mandatory compliance. There is no reason to believe that just because participation in a program is voluntary that the program will be ineffective, however. Trip reduction incentives (e.g., preferential parking for carpools, reduced transportation impact fees) and trip reduction planning in collaboration with major employers are examples of voluntary policies promoted by the proposed General Plan that have proven to be effective in other communities. In addition, the City itself is a large employer in the overall community. It would establish a trip reduction program for its own employees and advocate trip reduction actions as part of required Transportation Demand Management programs for new developments. Therefore, the conclusions in the Draft EIR remain valid in relation to increased ozone levels. As stated in the Draft EIR, Policy 5-P-13 would not reduce Impact 3.10-1 to a less-than-significant level, although it would reduce its magnitude.

102 D

Comment: Regarding General Plan Policy 5-P-2. Ensure the identified mobility system is provided in a timely manner to meet the needs of the Community. What is the definition of timely?

Response: Timeliness will depend in part on the pace of development in Petaluma. Traffic mitigation fees to offset the cost of the General Plan roadway improvements will be paid as development occurs which creates the need for those improvements. Additional information is provided in Master Response F.

102 E

Comment: Regarding the Planned Transportation Improvements: Page 3.2-22 lists 9 improvements including the Rainier Avenue Extension and Interchange and North Petaluma Boulevard Grid but Figure 3.2-4 identifies 11.

Response: Figure 3.2-4 of the DEIR shows 10 planned transportation improvements, which includes the 8 roadway improvements listed on page 3.2-22, and two transit improvements (the Corona and downtown Petaluma SMART stations). The Industrial Avenue extension south of Corona Road was dropped due to its location within the 100-year flood boundary area with depths in excess of 1'.

102 F

Comment: Regarding the North Petaluma Boulevard Grid Improvement: A "grid of streets" is inadequate. Where are the streets going to be? Where does it identify the number of vehicle trips used to forecast future traffic conditions? Where is the traffic analysis for the future traffic volumes?

Response: Since the General Plan is not a Specific or Site-Development Plan, it is not possible, nor is it necessary, to provide detailed improvement information, outside of the level of detail provided for the 9 planned roadway improvements identified on page 3.2-22 and shown in Figure 3.2-4.

The General Plan is intended to serve as a framework for future development in Petaluma, and provides policy guidance for future decisions that will determine the precise location and layout of the street network. The specific roadway locations of the North Petaluma Boulevard

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Grid Improvement have not been defined at this time. The transportation analysis is intended to provide a reasonable forecast of trip generation and the distribution of trips resulting from additional land uses and changes to the transportation network. The transportation model used to forecast these changes includes the conceptual locations of proposed east-west and north-south streets that would provide a new grid of streets in a portion of the North Petaluma area.

Comment: Did the City consider public opinion and the existence of public controversy in determining the significance of a project's environmental impacts (Rainier Avenue and DSL site).

Response: Yes, the City considered both and conducted very detailed analysis of the associated impacts. The project to be proposed on the DSL will have a project-specific EIR prepared; the Rainier Avenue improvements will also have subsequent environmental review undertaken due to the time separation from the previously certified EIR.

102
H & I

Comment: Regarding the Impacts and Mitigation Measures: Are the General Plan goals and policies related to improving multi-modal circulation for the entire City or only to preserve the pedestrian environment of Central Petaluma?

Response: The Proposed Plan contains goals and policies are intended to improve multi-modal circulation for the entire City of Petaluma (not just in Central Petaluma).

102 J

Comment: Will increased motor vehicle traffic result in unacceptable level of service at six study intersections (Significant and Unavoidable) in order to preserve the pedestrian environment of Central Petaluma?

Response: The comment is correct, in that the rationale behind the DEIR finding (that potential mitigations are infeasible) is based on a key component of the *Proposed General Plan*: preserving the pedestrian and historic building environment within Central Petaluma, and improving multi-modal circulation throughout the City.

103 A

Comment: Policies 8-P-4 A and 8-P-4B are insufficient mitigations for balancing development with demand. Water demand is based on "paper water".

Response: The City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 evaluated and identifies water conservation and recycled water as potable water offset sources. Water Conservation was not taken lightly and renowned water conservation expert, William Maddaus was employed to perform the work. In addition, the City of Petaluma is currently developing a Water Conservation Plan which will further increase water conservation to ensure 25% safety factors are employed for estimates made for both water conservation and recycled water offset. Water conservation specialists Bill Maddaus and Ned Orrett were on the project team. In addition, other agencies' and cities' water conservation plans, goals, and results were reviewed and evaluated to determine achievable results. Numerous water conservation measures were evaluated with a key objectives focusing on performance records, sustainability, public support, convenience of use, and longevity. The highly sophisticated water conservation computer model DSS was employed on the analysis to ensure that competing water conservation measures were not double counted and a conservative and realistic account of the water savings was obtained. In addition, a

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large focus was placed on construction of new development with water conservation practices in mind. This will ensure that facilities are constructed correctly from the beginning through ordinances and paid for by development fees and costly water conservation retrofit programs are not required to retrofit facilities that were constructed without accounting for water consumption. This type of proper water conservation construction for new development eliminates the need to rely on the public to consciously conserve water.

103 B

Comment: Is there an Urban Water Management Plan that includes plans to store water?

Response: The City has an adopted Urban Water Management Plan.

103 C

Comment: Impact 3.10-1 Particulate matter is life-threatening to asthma sufferers and is known to cause cancer. The use of least-polluting alternative heating methods and cleaner technologies should be promoted to provide useful heat, while minimizing any adverse health effects.

Response: The appropriate response to the comment is found in the General Plan itself. As outlined on page 4-12 of the Draft General Plan, current building code standards generally ban the installation of open-hearth, wood-burning fireplaces and wood stoves in new construction. The building code does, however, allow for the use of low-polluting wood stoves and inserts approved by the EPA in existing fireplaces, as well as fireplaces fueled by natural gas. General Plan Policy 4-P-15(F) seeks to reduce emissions from wood-burning stoves by providing natural gas hookups to residential fire places or requiring the installation of EPA-certified fireplaces. Under this same policy (4-P-15), the Draft General Plan seeks to promote the use of electric lawnmowers:

Improve air quality by reducing emissions from stationary point sources of air pollution (e.g., equipment at commercial and industrial facilities) and stationary area sources (e.g. wood-burning fireplaces & gas powered lawnmowers) which cumulatively emit large quantities of emissions....

Reduce emissions from residential and commercial uses by encouraging the following:

- Use of battery-powered, electric, or other similar equipment that does not impact local air quality for non-residential maintenance activities;

Provide natural gas hookups to fireplaces or require residential use of EPA-certified wood stoves, pellet stoves, or fireplace inserts.

103 D

Comment: Automobile pollution from HWY101 and local traffic congestion should also be addressed. Land uses next to freeways should be restricted from new housing and youth-oriented outdoor activities. The commenter suggests that automotive pollution should also be addressed and that user fees for gross and high-polluting vehicles be considered, with money going to an asthma inhaler rebate for children.

Response: Automobile pollution from Highway 101 and traffic congestion is discussed in Chapter 4 (Natural Environment) of the General Plan. As outlined in Policy 4-P-8(A) (see below), the City plans to reduce automobile pollution by encouraging the use of alternative modes to automobile transportation, including walking, bicycling, bus transit, and carpooling. Additionally, Draft General Plan Policy 4-P-13 seeks to separate residential and sensitive land

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receptors (i.e., facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly and people with illnesses) from potential sources of emissions. Air quality impacts associated with future highway projects or developments within proximity to Highway 101 would be evaluated in separate environmental impact analyses performed as part of CEQA compliance for those future projects. The relevant General Plan policies are as follows:

4-P-8(A) Enforce land use and transportation strategies described in Chapter 2: Land Use and Chapter 5: Mobility that promote use of alternatives to the automobile for transportation, including walking, bicycling, bus transit, and carpooling.

4-P-13 To avoid potential health effects and citizen complaints that may be caused by sources of odors, dust from agricultural uses, or toxic air contaminants the following measures would be necessary:

- Locate new stationary sources of air pollutants, such as industrial facilities, at sufficient distances away from residential areas and facilities that serve sensitive receptors to avoid significant impacts caused by odors, dust, and toxic air contaminants.

Include buffer zones within new residential and sensitive receptor site plans to separate those uses from potential sources of odors, dust from agricultural uses, and stationary sources of toxic air contaminants.

103 E

Comment: Why hasn't a larger plan to deal with renewable sources of energy been adopted? The commenter suggests that the General Plan consider a higher renewable energy threshold for City energy consumption.

Response: This comment is noted, but relates to a policy decision in the General Plan on rather than to the adequacy of the EIR.

104

Comment: Rezoning of parcels on Petaluma Boulevard North to retain existing industrial land uses.

Response: Comment noted; the designations of the parcels referred to were retained as Industrial, particularly where industrial uses exist. Other opportunity sites were designated Mixed-Use to support transit oriented development.

105 A

Comment: Fourteen recorded Native American and nineteen historic cultural resources. Change historic to historic-era.

Response: Corrections noted and incorporated into EIR document and, as requested, within General Plan text.

✓

Page 3.12-2 is amended to reflect the correction of the first paragraph in *Prehistoric Resource Sites* to state "the proposed planning area contains 14 recorded Native American and 19 historic cultural resources as of December 2001". Reference to "historic" is amended to read "historic-era". Page 3.12-8 second paragraph is corrected to remove reference to "paleontological" in association with the Sonoma State University Information Center. Page 3-P-7(f) is amended to read "Ensure the protection of known and unrecorded archaeological resources...for Native

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American and/or historic-era remains". Page 3.12-11 the above amendment is also reflected in the applicable General Plan Policy.

105 B **Comment:** SSU Information Center makes recommendations for historical and architectural resources, not paleontological.

Response: Information noted.

105 C **Comment:** General Plan text changes relative to known archaeological resources.

Response: Information noted; General Plan text will be amended.

105 D **Comment:** General Plan text changes relative to historic remains.

Response: Information noted; General Plan text will be amended..

105 E **Comment:** General Plan text changes relative to cultural resources.

Response: Information noted; General Plan text will be amended.

106 **Comment:** California PUC recommends "that any development projects planned adjacent to or near the rail corridor be planned with safety of the rail corridor in mind... includes considering pedestrian circulation... safety factors... planning for grade separation... improvements to at-grade crossings... appropriate fencing...."

Response: Policy 5.9.G-1 of the Draft *General Plan* has been updated to include language consistent with the PUC's request to the extent deemed appropriate and feasible by the City:

"Maintain the Northwestern Pacific Railroad (SMART) corridor for mobility purposes and ensure that any future projects adjacent to or near the rail corridor be planned with safety of the rail corridor in mind, especially with regard to pedestrian and vehicle circulation. Design treatments should include appropriate fencing, improvements to existing at-grade crossings, and coordination with the California Public Utilities Commission (PUC).

107 A **Comment:** Development along the Petaluma River – cumulative impacts to floodplain capacity and constraints of site to development (including reference to comments in response to NOP).

Response: See Master Response B.

107 B **Comment:** Impact on existing agricultural lands (comments in response to NOP).

Response: Lands designated 'agriculture' within the 1987-2005 General Plan are being retained as 'agriculture' in the General Plan 2025.

107 C **Comment:** Mitigation banking options.

Response: Mitigation banking has not been included in the General Plan and should only be considered, on a project by project basis, when on-site mitigation is not achievable.

107 D **Comment:** Pollutants: possible increase in pollutant load from development along River.

Response: See Response 70 KK.

107 E **Comment:** Sediment loads could be increased if appropriate setbacks are not designed.

Response: City of Petaluma already requires setbacks and expands setbacks from the River corridor as identified by the Petaluma River Corridor designation. SWMP also includes specific requirements of all new development to reduce and/or eliminate sediment during and after completion of construction.

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- 107 F** **Comment:** Increasing the percentage of impervious surfaces changes the overall hydrology of a site and increases the amount and velocity of site runoff. Storm runoff would also increase the pollutants (urban pollutants, nutrients, and pesticides) in the river.
Response: The change in impervious surfaces was modeled in the calibrated XP-SWMM model, showing a negligible change in mapped floodplain extents. A sensitivity analysis was also conducted pertaining to the potentially increased velocity of runoff and whether downstream peaks were raised due to the subsequent hydrograph combinations. We found that changes to downstream hydrographs were negligible. See Response 70 KK regarding sedimentation.
- 107 G** **Comment:** Habitat loss and water quality impacts near proposed Rainier Extension.
Response: The previously certified EIR for the Rainier project identified project specific mitigation for reducing habitat loss and water quality impacts. The subsequent EIR to be prepared on the reduced project will include similar or expanded mitigations. In addition, the expanded river corridor setbacks provide habitat preservation and enhancement opportunities throughout the Corona Reach, in the vicinity of the adopted Rainier Avenue Plan Line.
- 107 H** **Comment:** Needs GP alternative to provide feasibility of preserving parcels in the vicinity of Rainier Avenue.
Response: See Master Response A.
- 107 I** **Comment:** Parcels in the vicinity of Rainier Avenue provide high quality wetland, riparian and upland habitats.
Response: Comment noted. Any development proposed in the vicinity of Rainier Avenue must provide project specific mitigation measures to avoid adverse impacts and/or mitigate those impacts to acceptable levels. In addition, the Petaluma River Corridor identifies specific setbacks for the east bank of the Petaluma River in the vicinity of Rainier Avenue to protect existing tree growth and habitat.
- 107 J** **Comment:** Reminder that Petaluma River is impaired water body
Response: Comment noted. Development contemplated within the corridor must comply with the City Surface Water Management Plan including post-development controls to address water quality concerns to be consistent with the State water quality standards.
- 108 A** **Comment:** Commenter states that the alternatives analysis is defective because the EIR does not evaluate alternatives that would reduce or avoid the impacts of development pursuant to the General Plan.
Response: See Master Response A.
- 108 B** **Comment:** The DEIR includes no analysis of the substantial infrastructure improvements that are proposed as part of the water supply provisions; City should consider more conservation.
Response: The City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 outlines water demand projection methodology used which is clearly outlined in Chapter 2 of the City's Water Demand and Supply Analysis (WD&SA) report. The demand projections are realistic and were developed based on past water use patterns within the City of Petaluma and projected land use based on

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the City's Draft General Plan 2025. An independent analysis of water demand for the City of Petaluma was conducted by SCWA as part of their UWMP effort. Although the method used by SCWA was based on population and employment data, the two analyses yielded the same water demand projections for the City of Petaluma.

Chapter 3 of the WD&SA report outlines the methodology utilized for determining the supply/offset sources to meet the projected demands in each year through buildout. The combination of water supply sources consisting of SCWA supply, water conservation offset, recycled water offset, and City owned groundwater wells is the least cost project for meeting the City's demands. The costs and infrastructure required for each supply and offset source was clearly identified within the WD&SA report. The only supply/offset source requiring infrastructure is the recycled water system. The City of Petaluma's Water Recycling Facility (WRF) is currently under construction includes the treatment and pumping systems for production and distribution of recycled water. This infrastructure was included in the EIR for the WRF. In addition, numerous pipelines have already been constructed within the distribution system and are currently used for distribution within the existing recycled water system. Wastewater treatment plant effluent is not allowed for discharge into the Petaluma River between May and October per the City's NPDES permit with the RWQCB. This means that all wastewater produced during this time of year must be treated and distributed as recycled water. Since much of the recycled water infrastructure is already in place, wastewater must be distributed as recycled water between May and October, and the City is experiencing a need for potable water supply, it makes economic sense for the City of Petaluma to utilize recycled water for potable offset. Additional recycled water infrastructure within the distribution system is required to further implement recycled water for potable offset rather than to use it as it is currently used for agricultural purposes.

As a *program-level* document, the Draft EIR cannot anticipate all issues that might result from the siting and development of new infrastructure. A DEIR for the Water Recycling Expansion Program is now in the final stages of drafting and is expected to be available for public review in the Spring of 2008. It includes project level review of the first phase of the recycled water infrastructure program and a program level review of later phases which will be supplemented as needed as the program phases in over the time horizon of the General Plan. Approval of the WREP DEIR will precede any activities to acquire or construct the recycled water infrastructure necessary to carry out the program described in the General Plan 2025.

Water conservation is a very important element of water supply for potable water offset within the WD&SA report. In addition, the City of Petaluma has adopted a Water Conservation Plan which will further increase water conservation. The administrative draft of the Water Conservation Plan shows cost effective potable water offset via water conservation of almost twice what was recommended in the WD&SA report. Water conservation specialists Bill Maddaus and Ned Orrett were on the project team. In addition, other agencies' and cities' water conservation plans and goals were reviewed and evaluated.

Comment: Commenter states that the EIR fails to describe a fundamental change in the

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location of the proposed “Southern Crossing”.

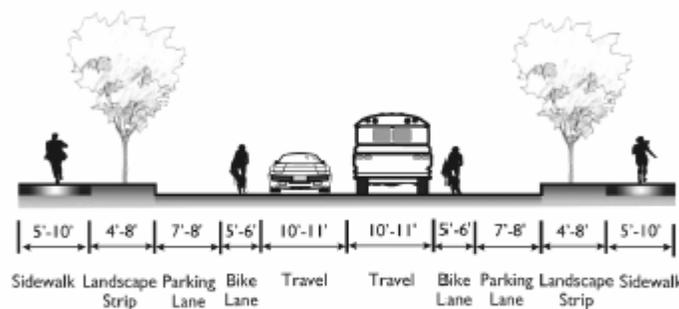
Response: Several commenters stated that the Proposed Plan includes a fundamental change in the location of the “Southern Crossing” and roadway extension (also known as the Caulfield Road Extension). Commenters stated that the Central Petaluma Specific Plan (CPSP) designated the roadway alignment along the edge of the Riverfront Parcel, with a neighborhood park in the center of the property, while the Proposed General Plan moves the southern crossing through the middle of the property and designates the roadway as an arterial street. Commenters stated that locating an arterial through the middle of the site would be inconsistent with the type of mixed-use development envisioned in the CPSP.

Key response points are listed numerically below:

1. The location of the proposed Southern Crossing and Caulfield Lane Extension as shown in the Proposed Plan is derived from a study conducted for the City of Petaluma entitled the *Caulfield Lane Extension Plan Line Study* (final report dated August 5, 2005). The intent of that study was to analyze the feasibility of potential alignments in order to refine the conceptual alignment shown in the CPSP.

The product of *Caulfield Lane Extension Plan Study* is a final report (dated August 5, 2005) that is a public document and was subject to review and public hearings, including 12 separate meetings with affected property owners. Key issues in developing a preferred roadway alignment included the need to locate river and rail crossings at feasible locations, while achieving a consensus among property owners. Following review by the City Council, a preferred alignment was selected that is consistent with the alignment shown in the *Proposed Plan*.

2. The proposed “Southern Crossing” and roadway extension is designated as an arterial. As described in the Proposed Plan, an arterial street could have no more than two travel lanes for motor vehicles, in addition to two bicycle lanes. On-street parking could be allowed on both sides of an arterial street.



Mixed-Use Street

3. Placing a roadway through a mixed use area is not incompatible with mixed use

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development as demonstrated on Petaluma Boulevard; an arterial street serves as “Main Street” through Downtown Petaluma.

108 D

Comment: The DEIR relies on ineffective, vague & uncertain GP policies.

Response: Public Resources Code section 21081.6(b) provides that in the case of a general plan, mitigation measures are made fully enforceable by “incorporating the mitigation measures into the plan....” See also CEQA Guidelines, Section 15126.4(a)(2), which notes the different mechanism for mitigation measures applicable to a general plan level CEQA document. Also, see Implementation Plan for assignment of specific policies and mitigations for implementation.

108 E

Comment: The EIR relies on future plans and studies as mitigation for potentially significant impacts, without establishing required performance standards.

Response: Public Resources Code section 21081.6(b) provides that in the case of a general plan, mitigation measures are made fully enforceable by “incorporating the mitigation measures into the plan....” See also CEQA Guidelines, Section 15126.4(a)(2), which notes the different mechanism for mitigation measures applicable to a general plan level CEQA document. The FEIR responds to comments made in other portions of this commenter’s remarks and questions about specific mitigation measures when it is possible to relate the comments to a specific impact or mitigation alleged to be inadequate.

108 F

Comment: The City proposed water capacity fees based on an overstatement of the amount of water needed for new development.

Response: See Response 108 B.

108 G

Comment: Statement that future development projects will be subject to site-specific review (Public Resources Code 21083.3) EIR needs to specify in more detail how it may be used in context of future site-specific projects.

Response: The General Plan 2025 EIR will allow subsequent specific projects which are consistent with the General Plan to limit project analysis under CEQA to effects on the environment which are peculiar to the parcel or project and which were not addressed as significant effects in the General Plan EIR. Regarding the reference in the comment to the water recycling program, see Responses 108 J and K.

108 H

Comment: Land Use and Mobility Alternatives Report, description and summary, no description of the relationship between the Report and the analysis in the EIR.

Response: The Land Use and Mobility Alternatives Report was a public research document utilized to identify the alternatives to be included in the Draft EIR; see Master Response A.

108 I

Comment: The EIR does not indicate whether the Central Petaluma specific Plan is incorporated by reference. Clarify the relationship between the proposed Plan with the alignment of the Southern Crossing and the CPSP.

Response: The Central Petaluma Specific Plan (“CPSP”) governs a land use planning subarea and is described in the DEIR, p. 3.1-3. It is identified at page 1-14 of the General Plan 2025 as an applicable City plan which must be consulted in conjunction with General Plan 2025 and

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described as part of the project's regulatory setting at DEIR, p. 3.1-15 and 3.1-16. It is not necessary to incorporate the CPSP, or any of the other applicable subarea plans into the General Plan 2025. Regarding the CPSP and the Southern Crossing, see Response 108C.

Comment: The Draft EIR segments the project and fails to fully describe the proposed project because it fails to describe the City's extensive water supply construction project.

Response: The General Plan is a program level, long-range policy document. The Draft EIR discusses in general terms the capital improvement program necessary to implement the recycled water program and identifies the expected components of it, as does the WDSA (Dodson 2006). Although all site-specific effects of such expansion can not be determined until detailed plans are prepared for additional infrastructure, it is reasonable to expect that new utility lines would be situated in existing right-of-ways and that treatment facilities would be expanded at their current locations. Any future infrastructure projects that would have the potential to generate new environmental impacts, such as pump stations or reservoirs, will undergo a *project-level* environmental review. As a *program-level* document, the General Plan Draft EIR does not and need not anticipate and analyze all issues that might result from the design, siting and development of all new infrastructure which may be required over the full time horizon of the General Plan. A DEIR for the Water Recycling Expansion Program is now in the final stages of drafting and is expected to be available for public review in the Spring of 2008. It includes a project level review of the first phase of the recycled water infrastructure program and a program level review of later phases which will be supplemented as needed as the program phases in over the time horizon of the General Plan. Approval of the WREP DEIR will precede any project-level activities to acquire and construct the recycled water infrastructure necessary to carry out the program described in the General Plan 2025.

108 K

Comment: Must explain how the EIR will be used in connection with permits and approvals for the City's water supply capital improvement program and the fee proposed to fund this program.

Response: The cost of the recycled water portion of the water supply program is \$44 million; the total cost including the Water Conservation Plan and groundwater system improvements is \$55 million. The information required by CEQA Guideline 15124 (d) for the General Plan 2025 (the "project") is contained in the DEIR, Technical Appendices C, Volume 2. The Notice of Availability for the preparation of the DEIR was distributed, pursuant to CEQA, to various agencies and the State of California, Office of Planning and Research, State Clearinghouse (see Comment 187, Volume 6.C, page 1294. Similar information for site-specific effects of such expansion are being studied at the project level for the Water Recycling Expansion Program will be contained in the project-level DEIR for that program which is now in the final stages of drafting and expected to be available for public review in the Spring of 2008. Approval of the WREP DEIR will precede any activities to acquire and construct the recycled water infrastructure necessary to carry out the program described in the General Plan 2025. City Resolution 2006-120, adopted June 19, 2006, incorporated a cost study for the water supply program identified in General Plan 2025 (Bartle Wells 2006) and is a resolution stating the

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City's intent to adopt increased water capacity charges sufficient to fund the recycling and conservation programs described in General Plan 2025. Those charges will be reviewed and if necessary revised upon General Plan 2025 adoption. All regulatory permits for any capital improvements will be obtained prior to any construction activity defined in the WREP EIR.

Comment: Specify the scope and timing of the Development Code revision, including the Subdivision Ordinance.

Response: Community Development Department is drafting an "Implementing Ordinance" that will be adopted with the General Plan and provide immediate consistency among the new General Plan land use designations and applicable zoning districts, use tables and development standards. The remainder of the regulations will rely on existing Zoning Ordinance and Smart Code provisions. Based on the joint study session on June 25 with the City Council et al, Community Development is completing a detailed scope of work and timeline for the Development Code, including a revised and integrated Subdivision Ordinance.

108 M

Comment: Analytical methodology for evaluating land use impacts as a comparison between the different land use designations.

Response: The General Plan 2025 land use impact comparisons were made by comparing development under proposed General Plan policies and goals to existing conditions. DEIR, p. 3.1-20. The DEIR states, "Land uses are impacts only relative to the prior use of the site or the surrounding use or character." *Ibid.* The first step in the General Plan process was the identification of "Existing Conditions, Opportunities and Challenges." DEIR, p. 1-2 and creation of the Existing Conditions, Opportunities and Challenges Report published in October, 2002 ("EEOC"). The EEOC provides baseline information on the existing conditions in the City. DEIR, p. 1-2. When the DEIR says that generalized land use categories were used to compare changes in land use *designations* from the existing and proposed General Plans (DEIR, p. 3.1-20), it does not mean that it measured impacts against the existing General Plan rather than against existing physical conditions. That reference is merely an acknowledgment that some changes in land use categories were discussed.

108 N

Comment: Farmland impacts.

Response: The classification of lands as having "Local Importance" based on soils as determined by the California Department of Conservation. That neither indicates current or reasonable recent-past farming practices have occurred on these properties. They were identified on Figure 3.7-3 of the DEIR for the purpose of identifying "Farmland and Soils". The lands actively farmed, 77 acres at the northern edge of the City, have been retained as Agriculture. Part of the remaining lands within the UGB, specifically those along the River, have been preserved through the designation of the Petaluma River Corridor and will be utilized for habitat protection and enhancement and water quality improvements to reduce soil sedimentation in the River. Others, identified as having development potential within the adopted Land Use Plans (including, but not limited to, the General Plan 1987-2005 and the Central Petaluma Specific Plan), identify those properties as having development potential. The Draft General Plan in most cases reduced that development potential but did not eliminate

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it. Page 2-9 of the DEIR is hereby corrected to amend the 42 acres referenced to correctly reflect 77 acres of agricultural land at buildout, to match existing land characteristics within Petaluma. The Draft General Plan also designates certain lands as being “Ag Dependent” to ensure the continued success of those businesses currently providing services to the surrounding agricultural uses in the County. Continued operation of existing ag support businesses is not threatened by the Draft General Plan policies nor the EIR mitigations. Much of the land designated as Lands of ‘Local Importance’ or ‘Grazing’ have been developed within the authority of the General Plan 1987-2005 such as the Southgate project at the corner of Lakeville Highway/Frates Road and Rockridge on Windsor Drive, respectively.

108 O

Comment: Commenter states that a fundamental change in development planning has been made for the lower reach of the Petaluma River – specifically with regard to circulation planning – and the proposed alignment of the Southern Crossing through the mixed use area (rather than at the periphery of the area)... the EIR fails to describe a fundamental change in the location of the proposed “Southern Crossing”.

Response: See response 108 C.

108 P

Comment: Commenter notes that the EIR rejects as infeasible mitigation measures for significant and unavoidable impacts at six study intersections... There no basis in these conclusory statements for the required findings... the EIR must be revised to either evaluate the proposed mitigation measures or to explain in detail why they are infeasible...”

Response: Several commenters noted that while significant impacts were identified at six study intersections, the DEIR made no attempt to identify or describe potential mitigation at those locations. Instead the DEIR stated that “installing additional lanes or expanding capacity at these locations would conflict with proposed General Plan goals and policies related to improving multi-modal circulation and preserving the pedestrian environment of Central Petaluma. Therefore, no mitigations are identified. Intersection impacts at these locations are significant and unavoidable:

- North McDowell Boulevard/Corona Road
- Lakeville Street/Caulfield Lane
- Lakeville Street/East D Street
- Petaluma Boulevard South/East D Street
- Sonoma Mountain Parkway/East Washington Street
- North McDowell Boulevard/Rainier Avenue”

Several commenters stated the opinion that (1) the DEIR explanation for finding mitigations to be infeasible is inadequate, and (2) that CEQA requires identification of the infeasible mitigations in declaring impacts to be significant and unavoidable.

CEQA permits the lead agency (in this case, the City of Petaluma) to determine that project impacts are significant and cannot be mitigated, and still to proceed with a project upon adoption of a Statement of Overriding Considerations (CEQA Guidelines §§ 15091(a)(3); 15093). The Guidelines note that “if the benefits of a proposed project outweigh the unavoidable adverse environmental affects, the adverse environmental affects may be

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considered acceptable". (CEQA Guidelines § 15093(a).

In this case, the development of potential mitigations at the intersection locations rests with the City's desire to avoid widening intersections, which would conflict with the Guiding Principles identified in the *Proposed Plan*, particularly those that call for preservation of historic character and the provision of multi-modal circulation options.

In order to codify this policy with regard to automobile level of service (LOS), Policy 5-P-10 of the *Proposed Plan* has been revised to state the following:

Policy 5-P-10: Maintain an intersection level of service (LOS) standard for motor vehicle circulation that ensures efficient traffic flow and supports multi-modal mobility goals. LOS should be maintained at Level D or better due to traffic from any development

A. A lower Level of Service may be deemed acceptable, by the City, in instances where the City finds that potential vehicular traffic mitigations (such as adding additional lanes or modifying signal timing) would conflict with the Guiding Principles of the General Plan, particularly with regard to:

- *Guiding Principal #2. Preserve and enhance Petaluma's historic character.*
- *Guiding Principal #6. Provide a range of attractive and viable transportation alternatives, such as bicycle, pedestrian, rail and transit.*
- *Guiding Principal #7. Enhance Downtown by preserving its historic character, increasing accessibility, and ensuring a broad range of business and activities and increasing residential activities.*

The above does not relieve any need to mitigate development related impacts, which may include multi-modal improvements to reduce identified impacts.

108 Q

Comment: Commenter states that the EIR relies on TDM measures as part of the mitigation to reduce the number of intersection impacts.

Response: See response 5 C.

108 R

Comment: Commenter states that parking impacts are not adequately mitigated, since reliance on General Plan policies and shared parking opportunities are "the epitome of ineffective and vague mitigation and cannot legally serve as the basis for a finding that parking impacts will be less than significant... the purported mitigation is not legally binding because it can freely be discarded by the City based on a finding..."

Response: There is no statutory or case authority requiring an EIR to identify specific measures to provide additional parking spaces in order to meet an anticipated shortfall in parking availability. The social inconvenience of having to hunt for scarce parking spaces is not an environmental impact; the secondary effect of scarce parking on traffic and air quality is. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. An EIR need only address the secondary physical impacts that could be triggered by a social impact. (Guidelines, § 15131, subd. (a).)

The City of Petaluma Municipal Code requires that an adequate supply of parking be provided

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- 108 S by new development. Therefore, the City has a fully enforceable mechanism in place to ensure that adequate parking is provided. However, it should be noted that the DEIR does not identify significant impacts to parking that require mitigation.
Comment: EIR does not provide a separate analysis of Cumulative conditions, instead relying on the Project analysis.
Response: The analysis of the Project includes an analysis of significant impacts resulting from the *Proposed General Plan's* impacts in combination with increased traffic, or changes in traffic patterns, resulting from cumulative projects outside of Petaluma. For instance, traffic growth on U.S. Highway 101 includes project-generated traffic (generated by land uses within Petaluma) as well as regional growth on the 101 corridor.
Since implementation of the *Proposed General Plan* will occur over a period of approximately 20 years, and since cumulative development in Petaluma is guided by the General Plan itself, it would not be possible to accurately analyze project impacts in the absence of cumulative growth. Any attempt to analyze the Project as a stand-alone entity (with no cumulative background growth included, but as an "Existing Plus Project" scenario) would strictly be an academic exercise and would not accurately provide an assessment of potential impacts under CEQA. Furthermore, while individual development projects may base an analysis of cumulative impacts on the change between "Cumulative without Project" and "Cumulative with Project" conditions, such a comparison simply would neither make sense or satisfy CEQA for the General Plan project which consists of cumulative build out over the General Plan time horizon. Therefore, impacts are based on the change between "Existing" and "Cumulative" conditions, with Project trips included in the "Cumulative" analysis, as was done in the DEIR.
- 108 T **Comment:** Analysis of future freeway assumes that HOV lanes will be added to US 101 through Petaluma. The EIR needs to explain why it is appropriate to assume that such HOV lanes will be built... to the extent the EIR assumption is based on the construction of HOV lanes that are not yet approved or fully funded, the EIR must evaluate future conditions...
Response: Continued growth and congestion on the Highway 101 corridor has led to plans to expand the highway from four to six lanes with the addition of high occupancy vehicle (HOV) lanes. Although this project is not fully funded as of mid-2007, this analysis assumes this widening to occur by 2025, consistent with County transportation planning assumptions described in the *Sonoma County General Plan 2020 DEIR*.
- 108 U **Comment:** General Plan policy regarding parks and recreation set forth a specific numerical standard is an example of the type of performance standard, which can support a finding that impacts will be reduced to less than significant level. This illustrates the type of standard that should be set forth elsewhere.
Response: Comment noted.
- 108 V **Comment:** Objection to proposed policy and program to revise park impact fee and dedication requirements.
Response: Comment noted. Policy 6-P-6 has been revised and renumbered as Policy 6-P-7. The referenced provision now reads, "A. Review, and if necessary, revise the City's Municipal

Response

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108 W	✓	<p>Code regarding the payment of community park impact fees to maximize all opportunities for funding community and neighborhood parkland, park improvements and park operation and maintenance through the development entitlement process.”</p> <p>Revisions to DEIR pg. 3.3-13 and General Plan text as noted above.</p> <p>Comment: Proposed park on lands designated river-dependent industrial.</p> <p>Response: The purpose of the General Plan is to “provide strategies and specific implementing policies, programs, and actions” and to establish “a basis for judging whether specific development proposals and public projects are in harmony with Plan policies and standards.” Thus, as indicated on page 6-13 of the plan, the proposed park location is approximate. Dependent upon land use proposals on adjacent lands and the long-term viability of river-dependent industrial should residential land uses be prevalent in the area, the long-term designation of future park needs is appropriate at the General Plan level. The Central Petaluma Specific Plan’s designation of lands to the south as Mixed Use were not originally envisioned to include a large residential component. The General Plan process allows the community to weigh in on the possibility of such a change of intention and to respond accordingly.</p>
108 X		<p>Comment: Ineffective mitigation with respect to police officer staffing.</p> <p>Response: DEIR pg 3.4-16 and General Plan Program 7-P-31 A is amended to provide additional clarity to read as follows: Provide additional staff to ensure as needed to maintain the minimum ratio <u>is maintained</u> as the population increases.</p>
108 Y		<p>Comment: Draft EIR’s failure to evaluate water supply issues in more detail, and to describe in detail the measures that are proposed to avoid water supply problems.</p> <p>Response: Impact 3.5-1 (EIR page 3.5-22) states that the proposed General Plan’s impact on the City’s water supply would be less than significant. The CEQA checklist (Appendix G of the CEQA Guidelines) requires analysis of several water supply issues. The first is the question of whether a water provider has a sufficient supply given current entitlements and contracts to meet the demand generated by a proposed project. The June 2006 Water Demand and Supply Analysis Report (WDSA) discusses how the City intends to meet increased demand resulting from buildout of the proposed General Plan. The WDSA, listed as Appendix C of the Draft EIR, demonstrates that such demand can be offset by water recycling, conservation and groundwater draws. The WDSA is included as an official appendix to the Draft EIR, and its main conclusions are summarized under Impact 3.5-1. No additional analysis of this issue is required.</p> <p>The commenter claims that the WDSA overestimates per capita water consumption, resulting in an exaggerated view of the capital facilities that might be needed to serve the City’s future needs. The City must ensure that the water consumption projections are reasonably conservative and reflect the greatest expected demand/impact on water supply. Water conservation strategies identified in the Draft EIR would be expected to reduce or limit demand. A water fee increase, a strategy identified by the commenters in Comment 108.Y, Point 5, is another possible demand management strategy. The commenters’ claim that</p>

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overestimating the size of the water treatment facility in the Draft EIR could cause the City to inflate related capital project fees (Comment 108.Y, Points 2 and 4) relates to future nexus studies which will be required to support adoption of any future increases in water capacity charges and/or development fees and is not an environmental impact under CEQA. The Draft EIR concludes that there would be a less-than-significant water shortfall, as noted at the end of the summary of Impact 3.5-1. Therefore, assuming that the strategies outlined in the WDSA, along with the water conservation programs and policies 8-P-1 to 8-P-7 in the proposed General Plan are implemented, additional mitigation would not be required. The contention that the proposed General Plan goals are not specific or enforceable (Comment 108.Y, Point 6) fails to acknowledge a general plan's role as a policy document: the guiding principles of a general plan can provide qualitative principles and quantifiable benchmarks to guide the scope and type of long range land use planning and development in the City. Public Resources Code section 21081.6(b) provides that in the case of a general plan, mitigation measures are made fully enforceable by "incorporating the mitigation measures into the plan...." See also CEQA Guidelines, Section 15126.4(a)(2), which notes the different mechanism for mitigation measures applicable to a general plan level CEQA document. In some cases, the proposed General Plan calls for specific actions, among them the development of a Water Conservation Plan that incorporates the Best Management Practices of the California Urban Water Conservation Council (page 3.5-21). This indicates that where quantitative standards are not outlined in the proposed General Plan itself, those City departments would be required to develop such standards following its adoption.

Another water supply issue that must be considered under CEQA is whether increased water demand would require expansion of existing water treatment facilities and whether such expansion could be expected to have environmental impacts. To meet demand generated under the proposed General Plan, the City is expected to expand its water treatment facilities. For clarification purposes, Impact 3.5-2 is revised to read as follows:

New development may result in the need to expand new water and wastewater treatment facilities, the construction of which may cause significant environmental effects.

The discussion under Impact 3.5-2 covers both drinking water and wastewater (sewer) treatment and does not require revision.

The commenter suggests that the Draft EIR does not provide enough detail about the impacts that expanding existing water supply infrastructure could have on the environment (Comment 108.Y, Point 1 and Point 7). See Response 108J.

The comments provided in Comment 108 Y, Point 3 are noted, but constitute the opinion of the commenter as to policy options and do not directly apply to the adequacy of the Draft EIR.

108 Z

Comment: Policy 8-P-X requires a study of the 100-year flood zone and prohibits entitlements in that zone until the study is complete, but does not include any performance standard.

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Response: Public Resources Code section 21081.6(b) provides that in the case of a general plan, mitigation measures are made fully enforceable by “incorporating the mitigation measures into the plan....” See also CEQA Guidelines, Section 15126.4(a)(2), which notes the different mechanism for mitigation measures applicable to a general plan level CEQA document. The performance standard is the determination of depth of flood waters in the 100-year storm event. The City Council determined, through the public deliberative process on the Draft EIR and Draft General Plan, that no development within the 100-year flood boundary area (see Figure 3.6-4 of the DEIR and Figure 3.6-5 attached hereto for the 100-year flood boundary) with a depth in excess of 1’ shall be developed. The XP-SWMM was utilized pursuant to the proposed Policy to determine the area affected by this policy and the policy has been amended to reflect Council discussion and direction.

- ✓ Page 3.6-12 of the DEIR is amended to provide text of Policy 8-P-X, now numbered 8-P-37 and 38, and DEIR page 3.6-13 is amended to reflect the completion of the 2-D model of the Petaluma River within the City of Petaluma and the identification of the areas of regulatory floodplain having 100-year storm depths in excess of 1’, see Exhibit 3.6-5, attached.

108 AA

Comment: Ineffective mitigation for impacts on biological resources. There are three parts to the comment: 1) A claim that most of the biological resources setting and impact information is inappropriately included in an Appendix (a December 2003 Technical Memorandum) rather than being presented in more detail in the body of the EIR. 2) An opinion that the mitigation measure for the impacts to special status fish species and their habitat is vague and lacks performance standards to ensure that the mitigation is actually carried out. 3) There are also ineffective mitigation measures to address potential impacts to the California Brackish water Snails, the salt marsh harvest mouse, special status bat species, American badger, amphibians, nesting raptor species, and other birds, and oak woodland and special status plant species.

Response: 1) There is substantial discussion in Section 3.8 of the EIR on the environmental setting for biological resources in Petaluma, with a focus on special status species. Potential biological impacts on these species associated with the General Plan buildout are identified. The Draft EIR provides sufficient background and understanding of the potential biological impacts of the proposed General Plan. The existing conditions and species information contained in Appendix F, the “Biological Resources Review (Technical Memo 3, December 2003)” is even more detailed, and it is appropriate and desirable to use an appendix for reporting such technical information. If there is a desire on the part of the public or the City’s decision-makers to review this more detailed documentation, it is available.

2 and 3) The EIR reiterates the proposed General Plan policies that, at a programmatic level, would reduce the impacts of the implementing the proposed project, i.e. the General Plan. The application of existing environmental permitting regulations including Clean Water Act Sections 401 and 404 and the federal and state Endangered Species Act requirements, along with implementation of General Plan policies 4-P-1 to 4-P-5 (see page 3.8-21) all serve to reduce biological resource impacts consistent with the applicable enabling legislation and policies. The desired “performance standards or provisions” for the degree and effectiveness of

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the mitigation are often rooted in the enabling legislation. Such provisions include “no net loss,” “least environmentally damaging practicable alternative,” and mitigation ratios established as an outcome of a resource agency’s review of a specific development application. These regulations and reviews also typically specify monitoring programs to ensure the effectiveness of the measures. Consequently, future study and consultations are identified in the Draft EIR, but the process for determining impacts and appropriate mitigation measures is defined in applicable regulations, and the measures or performance standards are established in consultation with the resource agencies. Since the General Plan policies are devised to be implemented at a programmatic level, individual projects proposed within the Petaluma Urban Growth Boundary will be analyzed through a CEQA process designed for those specific projects. Public Resources Code section 21081.6(b) provides that in the case of a general plan, mitigation measures are made fully enforceable by “incorporating the mitigation measures into the plan....” See also CEQA Guidelines, Section 15126.4(a)(2), which notes the different mechanism for mitigation measures applicable to a general plan level CEQA document.

108 BB

Comment: The commenter notes that the analysis of noise impacts does not evaluate those that will place a neighborhood park on the Pomeroy/Riverfront properties adjacent to heavy industrial development and that if the proposed park isn’t removed from the plan the potential noise impact should be evaluated.

Response: The purpose of the General Plan is to “provide strategies and specific implementing policies, programs, and actions” and to establish “a basis for judging whether specific development proposals and public projects are in harmony with Plan policies and standards.” Thus, as indicated on page 6-13 of the plan, the proposed park location is approximate. It would be premature to conduct an environmental impact analysis of the park’s environmental impacts until a final location has been chosen.

The proposed General Plan states that playgrounds and neighborhood parks “should generally not be undertaken” in areas with CNEL levels exceeding 72.5 dBA; however, the proposed General Plan does not prohibit these uses outright in such an environment. Other factors may be weighted in determining whether a park would be an appropriate use in this location--whether the proposed site is a good location for public access to the waterfront, whether the park would be convenient to a community that is underserved, whether the site would be a logical terminus for a trail system, etc. There are a number of factors that could lead to the conclusion that a park would be a reasonable use near an industrial land use. This is largely why the General Plan does not explicitly prohibit such a location; it may still be acceptable, even desirable to have a park near river-dependent industrial use.

During development of the proposed park, a separate analysis would be conducted to determine the environmental impacts of constructing the proposed park.

108 CC

Comment: No discussion in Section 3.4 or Section 3.13 on hazards regarding wildland fires adjacent to urbanized areas.

Response: The California Department of Forestry and Fire Protection is responsible for the administration of the Fire and Resource Assessment Program throughout Sonoma County, a

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program that prepares fire hazard severity zone maps. The map for Sonoma County identifies the City of Petaluma and adjacent unincorporated areas as falling outside of fire hazard zones.¹⁷ This indicates that there is no significant risk to life or property from wildfires within the proposed General Plan area. Wildland fire potential is addressed through the inclusion of Policy 7-P-27 in the Fire Protection section of the Community Facilities, Services, and Education Element.

108 DD

Comment: The listing of significant and unavoidable impacts is under-inclusive and needs to be revised to include all of the impacts determined in the EIR to be significant and unavoidable.

Response: The summary list of significant and unavoidable impacts within the EIR has been updated to include such impacts.

√ See attached Table ES-5 and updated list.

108 EE

Comment: Analysis of growth-inducing impacts does not comply with CEQA Guideline 15126.2(d).

Response: The General Plan DEIR describes and analyzes the General Plan's growth-inducing impacts at pp. 4-2 and 4-3 and the DEIR sections referenced therein.

108 FF

Comment: EIR's analysis of alternatives violates the fundamental purpose of an alternatives analysis in an EIR.

Response: See Master Response A.

108 GG

Comment: Recirculation of DEIR recommended.

Response: Comment noted; this was a concluding comment in the letter containing numerous comments. The statement references growth-inducing impacts (see Response 108 EE).

109 A

Comment: The DEIR was prepared by the same consultants that prepared the Plan itself...DEIR analysis is extremely superficial and the content and tone of the document is merely one of assertion of the rectitude of the planners' vision in proposed Plan.

Response: In conformance with Public Resources Code section 21082.1, the City has independently reviewed and analyzed the DEIR and all consultants' work product before public release of the DEIR. The DEIR reflects the City's independent judgment and the City is responsible for its adequacy and contents. CEQA Guidelines, section 15084(e). The DEIR is based on a solid technical backing that includes an analysis of traffic operations at 48 study intersections, utilizing a GIS-based TransCAD transportation model. The City of Petaluma conducted an update and conversion of the city-wide travel demand forecasting (TDF) model as part of continued planning efforts to address transportation infrastructure needs and assist in the update of the City's General Plan. Based upon year 2025 proposed General Plan land use data, the TDF model was used to generate traffic volume forecasts and other travel demand data so that future roadway deficiencies resulting from implementation of the City's proposed General Plan can be determined and mitigated. The model forecasts daily, AM peak hour and PM peak hour traffic conditions. The major inputs to the model are land use data and network (i.e., roadways) assumptions. The model outputs relate primarily to auto travel, but some

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conclusions can also be inferred for alternative transportation modes.

Impacts are identified at 16 intersections, of which the majority would be less than significant if the City adopts new the LOS criteria contained in the Proposed General Plan. Impacts would remain significant at some locations as described in the DEIR (see Master Response F for further discussion of those impacts).

The DEIR also evaluates overall mobility for motorists, bicyclists, pedestrians, and transit users. Impacts are identified based on the significance criteria identified in the plan. Ultimately, the decision as to whether changes to LOS criteria, and whether or not it is feasible to mitigate significant impacts, will rest with the City's decision makers.

109 B **Comment:** The alternatives analysis is a pro forma exercise for the purpose of creating the appearance of compliance with the CEQA requirement.

Response: See Master Response A.

109 C **Comment:** The alternatives analysis includes no meaningful variation in land use alternatives.

Response: See Master Response A.

109 D **Comment:** The population totals for all of the alternatives considered in the DEIR analysis of alternatives make no sense in light of regional projections, e.g. Association of Bay Area Governments projection of year 2025 population for Petaluma is 65,600 residents.

Response: The ABAG numbers rely on existing planning documents at the time that their projections were developed. In the case of Petaluma this would have been the 1987 General Plan which projected between 60,000 and 67,000 residents at buildout. Since that time the Central Petaluma Specific Plan was adopted resulting in the potential for approximately 1,617 additional housing units or 4,444 people (CPSP EIR). Thus the no project alternative could range between 64,444 and 71,444. In addition to the CPSP there have been lands within the UGB which through GP amendments have converted from nonresidential to residential uses further increasing the population projection. The notion that the DEIR population projections are inflated is not an accurate statement. The City's parcel by parcel analysis of existing and future development provides the most accurate information possible to decision makers and the public. In fact, the Draft General Plan 2025 preferred alternative provides for only a small increment of the projected buildout population, less than 1,300 new residents.

109 E **Comment:** 1. The analysis of alternatives in the DEIR does not include any coherent testing of variations on the major transportation improvements. There is no testing of variations of the major transportation improvement package in combination of a fixed land use alternative... consequently, it cannot be determined whether differences in transportation system performance are the result of variations in the transportation improvements... or the result of differences in the land use alternative."

2. The assessment of transportation performance among the alternatives in the DEIR is needlessly limited to superficial measures, instead of the peak hour level-of-service quantifications prepared by the proposed plan... there is no justifiable reason for this limited transportation analysis of the alternatives since, once the computerized transportation analysis model stream has been set up, as it was for the proposed plan, there is no meaningful extra

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effort in providing an equivalent level of analysis.

3. The substance of the transportation evaluation in the DEIR's analysis of alternatives is illogical. The variations in daily trip generation (and consequently projected daily traffic volumes on major streets) do not reasonably correspond to the differences in the land use alternatives in the land use alternatives for which they are projected.

4. The project LOS analysis indicates... in footnotes... that traffic operational conditions cause the intersections to operate at a worse LOS than indicated in the theoretical LOS calculations... when this circumstance occurs, the normal procedure is to substitute the field-observed LOS reflecting the operational constraints for the theoretical computations.

5. Failure to identify significant impacts... while the disdain of the consultants who prepared the proposed plan and DEIR for mitigation measures such as adding lanes at impacted intersections is made amply evident in the text of the Plan and the DEIR documents, this does not relieve... the obligation under CEQA of informing the public of conventional traffic mitigation measures.

6. DEIR fails to evaluate components of the Bike/Pedestrian Component of the General Plan... the DEIR treats the bike/pedestrian facilities components which emerges... as inherently good and environmentally impact free... to be adequate the DEIR must define the impacts... for instance, off street trails may pose nuisances and privacy and security concerns for neighborhoods... and in order to implement on-street bike plans... it is necessary to eliminate parking.

7. Illogical juxtaposition of major transportation improvements and unmitigated impact locations... it is clear that the plan proposal to degrade the City's level of service policy is driven by a desire to avoid... traffic improvements in downtown Petaluma where the plan desires to maintain and enhance a pedestrian—friendly environment... however, the DEIR fails to note the change in LOS standards could have the effect of making it more difficult to require mitigation, or to justify denial of site development projects regarded as detrimental to the community.

Response:

1. The commenter's concerns have been noted for the record.

2. The CEQA Guidelines Section 15126.6 requires that an EIR describe and comparatively evaluate a range of alternatives to the proposed project. The lead agency is given substantial latitude in determining the range of "reasonable" alternatives under the general guidance that alternatives must be "feasible" and "shall be selected and described in a manner to foster meaningful public participation and informed decision making." The analysis of the environmental effects of the alternatives is intended to be less detailed than the analysis of the proposed project and to be primarily comparative.

Unfortunately, a transportation model has yet to be developed that successfully operates as the commenter suggested (with little time or effort needed to adjust model assumptions in order to evaluate various scenarios). In reality, a number of steps required, in order to (1) properly code the model to take into account the different road network characteristics between differing

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alternatives; (2) process the raw data produced by the model outputs so that they then be inputted into a separate software program that performs the level of service (LOS) analysis (model outputs are rarely ready to be immediately used to forecast traffic operations, they require a process of calibration known as “finessing”).

3. This comment helps to highlight the underlying message demonstrated in the alternatives comparison: that traffic generation is not merely a function of what types and sizes of land uses are allowed, but where the location and mix of land uses is also a factor, as well as how those land uses interact with the surroundings.

A classic example is provided by comparing an office in a suburban location with that of a downtown location: while both locations may be identical in size and function, the office in the downtown location will generate fewer vehicle trips per square feet than the suburban location, since such factors as (1) the price and availability of parking; (2) the convenience of public transit; (3) the presence of adjacent land uses; and (4) the design of the local street network can affect the amount of traffic generated by individual developments (among other factors). This can be easily observed in comparing the typical mode split of employees in downtown San Francisco offices with that of suburban locations.

Similarly, future development patterns in Petaluma could take several forms. The Proposed General Plan includes an emphasis on infill and mixed-use development, to be located in or near downtown Petaluma and near transit stations. As a result, the Proposed General Plan would generate fewer vehicle trips on a per capita basis than development in less walkable and less central locations, which is illustrated in the comparison of alternatives. As a result, the trip generating characteristics of each alternative do not directly correspond with raw amount of land uses assumed at build-out of each.

4. The field-observed LOS observations represent a qualitative analysis of LOS. However, for CEQA purposes, an LOS analysis based on quantitative measures is required, as was done in this case.

5. See Response 108 P.

6. The social inconvenience of having bicyclists look into one’s yard is not an environmental impact, which requires CEQA analysis. The EIR need only address the secondary physical impacts that could be triggered by a social impact. (Guidelines, § 15131, subd. (a).) CEQA does not require the City to identify specific measures to provide additional security, or eliminate perceived nuisances, although these will no doubt be considered prior to implementation of any potential bicycle/pedestrian facility.

Furthermore, the installation of bicycle lanes on existing streets is categorically exempt from CEQA. If such a project were to include removal of motor vehicle travel or parking lanes, then a CEQA finding would be necessary to determine whether significant impacts to motor vehicle circulation could result, but at this time it has not been determined that lane removals would be necessary.

7. If future development applications are within the land use categories and traffic-generating categories contained in the DEIR, and such applications are consistent with the multi-modal

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mobility goals described in the Proposed General Plan, then the commenter's statement may be accurate, since the City will be less likely to deny projects consistent with the *Proposed General Plan*, and would not require mitigations that are expressly identified as infeasible in the DEIR.

On the other hand, if future development applications are submitted without considering the underlying mobility goals expressed in the *Proposed General Plan*, then the City would have ample justification for findings to deny individual development applications.

110 A **Comment:** Commenter states that the alternatives analysis is defective because the EIR does not evaluate alternatives that would reduce or avoid the impacts of development pursuant to the General Plan.

Response: See Master Response A.

110 B **Comment:** DEIR has repeated reliance on general, vaguely worded policies as mitigation.

Response: Public Resources Code section 21081.6(b) provides that in the case of a general plan, mitigation measures are made fully enforceable by "incorporating the mitigation measures into the plan...." See also CEQA Guidelines, Section 15126.4(a)(2), which notes the different mechanism for mitigation measures applicable to a general plan level CEQA document. Where comments identify specific mitigation measures which the commenter deems inadequate, specific responses are presented as part of Responses to those specific comments.

110 C **Comment:** DEIR has repeated reliance on future plans, studies, and permits as mitigation.

Response: Where comments identify specific mitigation measures which the commenter deems inadequate, specific responses are presented as part of Responses to those specific comments.

110 D **Comment:** DEIR fails to identify an environmentally superior alternative to proposed Plan.

Response: See Master Response A.

110 E **Comment:** Topics are missing from the cumulative impacts analyses.

Response: This general comment is made more specific at Comment 110U. See Response 110U.

110 F **Comment:** The discussion of significant and unavoidable impacts did not include the 6 intersections.

Response: The summary list of significant and unavoidable impacts within the EIR has been updated to include such impacts.

√ See attached Table ES-5 and list.

110 G **Comment:** Implementation of a TDM program is not required or permitted.

Response: See response 5 C.

110 H **Comment:** "Identify increased funding sources" for transit is no guarantee.

Response: See Response 23 C regarding implementation and funding.

110 I **Comment:** The policy to reduce parking impacts... is vague and unenforceable.... Similarly... the TDM program is relied upon as mitigation.

Response: There is no statutory or case authority requiring an EIR to identify specific measures

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to provide additional parking spaces in order to meet an anticipated shortfall in parking availability. The social inconvenience of having to hunt for scarce parking spaces is not an environmental impact; the secondary effect of scarce parking on traffic and air quality is. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. An EIR need only address the secondary physical impacts that could be triggered by a social impact. (Guidelines, § 15131, subd. (a).) See also Master Response F.

Comment: School enrollment impacts. The commenter suggests that it is unclear why population projections show a decline in future student enrollment in Petaluma schools.

Response: The Draft EIR employs a commonly used population projection method to predict the population of school age children at full buildout of the proposed General Plan. In general, municipal population projections are done by predicting how the number of people in age cohorts (groups of people in a similar age range) will change over time. The method used for the Draft EIR applies statistical change rates for births, deaths, immigration and emigration to 2000 Census population data that have been broken down by age cohort and sex. (Change rates determined by the National Center for Health Statistics were used for the Draft EIR.)

In California, where overall population growth rates are high, localized population declines appear to be anomalies. However, the Petaluma population is expected to increase overall; the expected population decline is limited to age cohorts of 19 years or younger. In Petaluma, this trend can be explained by a relatively high population in older age cohorts (Table C&R-2).

Table C&R-2. Petaluma Population by Cohort, U.S. Census (2000)

<i>Age Cohort</i>	<i>Number of People</i>	<i>Percent of Total Population (%)</i>
Under 5 years	3,612	6.6
5 to 9 years	4,168	7.6
10 to 14 years	4,145	7.6
15 to 19 years	3,654	6.7
20 to 24 years	2,614	4.8
25 to 34 years	7,039	12.9
35 to 44 years	10,143	18.6
45 to 54 years	8,577	15.7
55 to 59 years	2,745	5.0
60 to 64 years	1,824	3.3
65 to 74 years	2,835	5.2
75 to 84 years	2,341	4.3
85 years and over	851	1.6
Total	54,548	100.0

According to statistics, Petaluma residents are aging faster than they are reproducing. The

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aging of certain cohorts – particularly women of child-bearing age—combined with low net recruitment rates (calculated by adding expected births and immigration and subtracting expected deaths and emigration) have produced a slow decline in the anticipated number of school-age children in the Draft EIR population model. An estimated 53.7 percent of the Petaluma population, according to Table C&R-2, was over 35 in the year 2000, a percentage that is expected to grow. Immigration statistics, defined in this context as the movement of individuals from outside communities to Petaluma, weight the age cohort composition towards higher age cohorts because Petaluma “immigrants” are statistically more likely to belong to older age cohorts. Emigration statistics also reduce the number of individuals in younger age cohorts, e.g., young adults (the group with the highest child-bearing rate) are a highly mobile population with a statistically higher tendency to migrate out of Petaluma. The tendency for people in 20- to 34-year-old age bracket to emigrate to other communities decreases the associated growth rate of school age cohorts.

These combined factors resulted in a prediction of a decreased school-age population at full General Plan buildout in the Draft EIR model. See the Response to Comment 1 for further discussion of population projections.

110 K

Comment: “Consider funding additional staff...” is not adequate mitigation for anticipated police staff levels.

Response: See Response 108 X.

110 L

Comment: DEIR needs discussion of safe yield of the system, and available water supplies in drought years or a series of dry years.

Response: The City of Petaluma has prepared a 2005 UWMP. A resolution of the City Council of the City of Petaluma adopting the City of Petaluma 2005 Urban Water Management Plan was signed on May 7, 2007. In past years, the City of Petaluma has along with its other SCWA water contractors had their UWMP prepared by SCWA. SCWA started the process prior to the due date of December 2005, but did not complete the UWMP in a timely fashion. The City of Petaluma along with other SCWA contractors then undertook the preparation process for their individual UWMP’s independently of SCWA. The work for the City of Petaluma is based on the City of Petaluma’s UWMP. The water demand and supply projections developed within the Water Demand and Supply Analysis work were based on conservative water demand development and supply/offset. Analysis for single and multiple dry years is included within the City of Petaluma’s UWMP and the City’s Water Shortage Contingency Plan which is included within Appendix C of the City of Petaluma’s 2005 UWMP. The Water Shortage Contingency Plan accounts for rationing stages and reduction goals up to a 50%+ supply shortage. These reduction stages reduce the overall water demand and are not intended to increase water supply through use of the City’s potable groundwater wells. The intent of the City’s potable water wells is to reserve existing and future City-owned well capacity for emergency/backup potable water supply. An emergency/backup water source would be required if SCWA experienced a situation where the quality or quantity of water provided to the City was impacted. Such an emergency could result from a SCWA transmission system

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failure or a problem with the quality of the water being provided to the City by the SCWA.
Comment: Policy 8-P-X requires studying the 100-year flood zone and prohibits entitlements in that zone until the study is complete, but does not include any post-study mitigation. Therefore, Impact 3.6-5 appears to remain significant.

Response: The 2-D study has been completed and areas containing in excess of 1 foot of water depth during a 100-year storm event are reflected in Figure 3.6-5, attached. In addition to Policies 8-P-37 and 8-P-38, the City will add the following post-study mitigations:

1. Until remapping of the regulatory floodplain occurs, new residential development in the portion of properties identified in 100-year flood boundary area, with depths of less than one foot of water during a 100-year storm event will be required to elevate the lowest floor two feet (2') above the BFE as determined by the City 2-D model.
2. New non-residential development in the 100-year flood boundary area with less than one foot of water depth during a 100-year storm event will be required to provide flood protection at least 1 foot above the BFE, or elevate the lowest floor two feet above the BFE.
3. Residential development shall be prohibited on the first floor of structures within the regulatory floodplain.

✓

Exhibit 3.6-5 is appended to the DEIR; DEIR pg 3.6-12 and General Plan Policy 8-P-X, now renumbered to 8-P-33 through 8-P-35, is expanded to reflect the additional wording above.

110 N

Comment: The commenter asserts that building codes cited in the Draft EIR, which claim to reduce the significance liquefaction in the event of a future earthquake, would not be sufficient in the event of a large-scale earthquake. He also calls for more discussion of the impacts of earthquake-related liquefaction hazards on infrastructure.

Response: The City of Petaluma, including the downtown area, is located in a seismically active area. In the event of a major earthquake, severe liquefaction damage could occur to buildings and infrastructure. However, adherence to building codes and construction standards would reduce the risk of injury or death from earthquakes to the maximum extent technically practicable.

The following discussion regarding the integrity of infrastructure in the event of widespread soil liquefaction is added to Impact 3.7-1 of the Draft EIR, following the bulleted list at the top of page 3.7-25:

Construction standards and seismic design criteria for roadways are contained in such regulatory codes as Caltrans' *Seismic Design Criteria Version 1.2* (December 2001), *Highway Design Manual*, Sections 110.6, *Earthquake Consideration* (November 2001), and 113, *Geotechnical Design Report* (November 2001), or similar codes adopted by a city for roadway corridor protection. These criteria deal with pavement and subsurface utility design (flexible joints and couplings, overpass construction, etc.), slope stability (especially slumping, settling, and liquefaction in fills), alignment modification to reduce exposure to fault rupture or intense ground-shaking, and ground failures such as

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liquefaction. Prior to construction, geotechnical studies are required to be undertaken and recommended seismic-protection measures are required to be incorporated in the project design. The recommendations provide the required protection from the anticipated effects of seismic ground-shaking.

The State regulations guidelines protecting bridges and overpasses from geo-seismic hazards are contained in Caltrans' Bridge Design Specifications, Bridge Memos to Designers, Bridge Design Practices Manual, and Bridge Design Aids Manual. These manuals provide state-of-the art information to address geo-seismic issues that affect the design of transportation infrastructure. Seismic resistant design is required to conform to the Bridge Design Specifications, and Section 20 of Bridge Memos to Designers, as well as the Caltrans Seismic Design Criteria. The seismic provisions contained in these design guidelines, or similarly accepted ones, would be applied to the construction of the rail over-crossings proposed for the planning area.

The Natural Gas Pipeline Safety Act of 1968 as amended through March 2006 (Title 49 Section VIII USC Chapter 601) specifies, among others, the minimum safety standards for designing, installing, constructing, initially inspecting, and initially testing a new natural gas pipeline facility. The design standards for specific locations reflect site-specific geological, topographical, seismic, and soils conditions. All gas pipeline projects delivering gas through a distribution system must also be designed and constructed to meet or exceed the federal safety standards established in 49 Code of Federal Regulations (CFR) Part 192 and the state standards established in CPUC General Order 112 E. Seismic design standards are included in these codes.

Adherence to these standards of protection is mandatory and would reduce the risk of injury or death from earthquakes to the maximum extent technically practicable.

110 O

Comment: Mitigation for loss of habitat and special status species resulting from Plan buildout relies primarily on permit compliance, with no evidence. Protecting habitat and sensitive species on a project-by-project basis, by way of environmental permitting compliance, is viewed as an insufficient protection and inappropriate deferral of mitigation by the commenter.

Response: The commenter claims that the Draft EIR is inappropriately deferring mitigation for biological impacts by suggesting that impacts on habitat and sensitive species would be mitigated on a project-by-project basis. Impact 3.8-1 (Draft EIR page 3.8-20) does state that individual project-level permit reviews and environmental analysis would help to reduce the cumulative biological impacts of the plan. However, individual project-level review and mitigation is not the appropriate level of analysis, by definition, in a programmatic EIR, such as the General Plan EIR. Public Resources Code section 21081.6(b) provides that in the case of a general plan, mitigation measures are made fully enforceable by "incorporating the mitigation measures into the plan..." See also CEQA Guidelines, Section 15126.4(a)(2), which notes the different mechanism for mitigation measures applicable to a general plan level CEQA

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document. The Draft EIR introduces discussion of project-level analysis to highlight those issues that cannot be analyzed in a program-level EIR, such as site-specific design considerations, but would instead be evaluated when actual development projects are advanced. The application of existing environmental permitting regulations including Clean Water Act Sections 401 and 404 and the federal and state Endangered Species Act requirements, along with implementation of General Plan policies 4-P-1 to 4-P-5 (see page 3.8-21) all serve to reduce biological resource impacts consistent with the applicable enabling legislation and policies. The desired “performance standards or provisions” for the degree and effectiveness of the mitigation are often rooted in the enabling legislation. Such provisions include “no net loss,” “least environmentally damaging practicable alternative,” and mitigation ratios established as an outcome of a resource agency’s review of a specific development application. These regulations and reviews also typically specify monitoring programs to ensure the effectiveness of the measures. Consequently, future study and consultations are identified in the Draft EIR, but the process for determining impacts and appropriate mitigation measures is defined in applicable regulations, and the measures or performance standards are established in consultation with the resource agencies.

A programmatic Draft EIR analysis can only estimate biological impacts in terms of the overall projected buildout or development “footprint” of the General Plan’s implementation. Thus, the impact and mitigation analysis covers impacts to specific species and habitat areas within the Urban Growth Boundary: sensitive fish species, the California brackish water snail, the salt marsh harvest mouse, special status bat species, the American badger, the western pond turtle, the California tiger salamander, the foothill yellow-legged frog, the California red-legged frog, nesting raptor species, and special status bird species. Policies cited in the DEIR, 4-P-1 to P-P-5, establish a biological protection framework and a set of performance standards and requirements for applicants to use in the planning and design of their projects.

110 P

Comment: Each of the impact assessments for special status species relies on future studies and permitted for individual projects. Permits may or may not actually mitigate the impacts to a less-than-significant level.

Response: The commenter believes that the policies outlined under Impacts 3.8-1 through 3.8-10 focus on future, rather than present management actions. However, the purpose of a general plan is to serve as a long-term policy document. As such, the proposed General Plan provides both long-term, qualitative goals and more quantitative, short-term benchmarks, sets long-term conservation and habitat enhancement goals, and outlines principles that the City should consider when considering whether to approve individual development projects. See also Response to Comment 110 O.

110 Q

Comment: Discussion of both setting and impact of aircraft noise relies entirely on time-averaged (CNEL) noise metrics. This disregards the disruptive effects of single-event noise from increased aircraft overflights. The commenter notes that the discussion of aircraft noise is through time-averaged (CNEL) noise metrics that they allege ignores the disruptive effects of single-event noise from increased aircraft overflights – since the use of only averaged noise levels does not adequately characterize the noise impact from that

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source.

Response: The *Berkeley Keep Jets Over the Bay v. Board of Port Commissioners* case, cited by the commenter, pertained to the issue of sleep disturbance potentially caused by “single-event” landings or take-offs of large, commercial jets at an international airport, an issue that is not applicable to the Petaluma Municipal Airport. This airport is a small municipal airport with an average of 145 flights per day of mostly small, private aircraft. It is classified in the National Plan of Integrated Airport Systems (NPIAS) as a reliever airport for the greater San Francisco Bay Area. Although the airport is operational 24-hours a day, it is only staffed between 8:00 am and 5:00 pm, and allows only limited night operations. Additionally, Chapter 2 (Land Use) of the General Plan does not indicate any new additional sensitive noise receptors would be added within the airport’s 65 dB CNEL noise contour. Therefore, the CNEL noise metric is an appropriate measurement for noise impacts resulting from the implementation of the General Plan.

110 R

Comment: Impact 3.11-1 states that impacts of development on hills would be minimal because the Plan’s policies call for protecting ridgelines and hillsides. However the policy is written such that it offers no such protection. It starts “Allow...” this is the opposite of prohibiting such development, therefore this impact should be considered significant and unmitigated by the Plan.

Response: The General Plan does not prohibit development within areas with varying topography; rather it “allows” development within these areas subject to preserving the ridgelines and prominent hillsides. In addition, the Community Development Department per Council direction is preparing a comprehensive update to the Development Code (zoning and subdivision regulations) with hillside/ridgeline preservation as a priority item to be addressed in implementing the new General Plan. See Draft GP Policies 2-P-16 and 2-P-17.

110 S

Comment: The EIR’s identified significant and unavoidable impact on intersection operations has been omitted from Section 4-1.

Response: Section 4-1 and the summary list of significant and unavoidable impacts within the EIR have been updated to include intersection impacts.

✓

See attached updated list.

110 T

Comment: Growth-inducing impacts discussion should be expanded to address the possible growth-inducing effects of tapping into groundwater supplies and expanded wastewater recycling.

Response: Please refer to DEIR Section Reference E.3, 2.5, 3.5, 3.6, Volume 2 Appendix C, Water Supply and Demand Analysis Report (June 2006) and Volume 4 Appendix F-2, Groundwater Feasibility Study (February 2004).

110 U

Comment: Cumulative impact discussion is missing any discussion of flooding, water quality, and geologic impacts. It also states that public services would not be affected by cumulative development, but does not explain why.

Response: Cumulative flooding impacts were included in the XP-SWMM model by evaluating

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not only runoff from the City, but runoff from the entire watershed which includes areas outside City limits. Discussion of policies and mitigation measures for protecting water quality takes into account cumulative actions of the County of Sonoma in unincorporated areas that affect City water quality. See, e.g., DEIR discussion of General Plan Policies 8-P-20.B and 8-P-29, pages 2.6-7 and .6-8. Potentially adverse effects associated with seismic hazards, expansive soils, topographic alteration and soils are usually site-specific and generally do not combine with similar effects that can occur with other projects in the Planning Area. See discussion, DEIR, page 4-4. The DEIR also makes clear that some cumulative analysis is contained throughout the document, such as in Chapter 3, because of the nature of the General Plan as a long-range planning document. DEIR, page 4-3. The discussion of public services in Chapter 3, where appropriate (see schools, police, fire services), includes consideration of areas and activities outside of Petaluma's UGB together with development envisioned by the General Plan within the City.

110 V

Comment: Analysis seems to state that the project would contribute to cumulative biological impacts, but the conclusion sentence says that it would not; no logical connection from the analysis to the conclusion. The commenter requests a clarification of the discussion in paragraph one, page 4-5.

Response: The text in the Draft EIR in paragraph one on page 4-5 is revised to read as follows:

Because the planning area is a large area and represents an emerging natural habitat island in an increasingly urbanized area, the proposed project's contribution to the loss of relatively undisturbed plant and wildlife habitat in the region could be potentially significant ~~would be considerable~~.

This does not change the conclusions with regard to cumulative impacts. In the following paragraph, the Draft EIR concludes that the cumulative impact of the proposed General Plan could be reduced to a less-than-significant level through the application of project-level mitigation and through the preservation of biologically productive habitats. This text is also modified slightly for clarification purposes:

The proposed project's potentially significant ~~considerable~~ contribution to the regional loss of wildlife habitat would be somewhat reduced through project design that preserves natural habitat areas to retain wildlife movement corridors. Project-level mitigation would help to reduce cumulative impacts through preservation of valley oak and riparian woodlands, wetlands, and other natural habitats within proposed open space. Policies outlined in Section 3.8, Biological Resources, would ensure the cumulative impact is less than significant.

While the project area is large and covers many acres in the Petaluma watershed, the regional impact of project implementation can be reduced by carefully prioritizing which areas of habitat are most important at this scale for sensitive species' survival. The proposed General Plan contains policies which provide for a watershed-scale conservation planning program, for example Policies 4-P-1, 4-P-3, 4-P-4 and 4-P-5, discussed under Impact 3.8-1 on page 3.8-20 of

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the Draft EIR. The loss of any habitat has some biological impacts, which means that even biologically sensitive design would have some impacts; however, if the most productive habitat within the proposed General Plan area is preserved, and if connectivity is maintained between habitat patches, the impact would be expected to be less than significant.

110 W

Comment: EIR does not include any alternatives that have been designed to reduce or eliminate the project's significant impacts.

Response: See Master Response A.

110 X

Comment: The traffic section of the alternatives fails to include an assessment of the intersections that would be significantly and unavoidably impacted by the project, so it is not possible to see if the alternatives would, in fact, mitigate any of these alternatives.... the traffic section of the alternatives fails to include an assessment of the intersections that would be significantly and unavoidably impacted by the project, so it is not possible to see if the alternatives would, in fact, mitigate any of these alternatives.

Response: The CEQA Guidelines Section 15126.6 requires that an EIR describe and comparatively evaluate a range of alternatives to the proposed project. The lead agency is given substantial latitude in determining the range of "reasonable" alternatives under the general guidance that alternatives must be "feasible" and "shall be selected and described in a manner to foster meaningful public participation and informed decision making." The analysis of the environmental effects of the alternatives is intended to be less detailed than the analysis of the proposed project and to be primarily comparative.

110 Y

Comment: The plan is identified as its own environmentally superior alternative, rather than provides a discussion to identify an environmentally superior alternative.

Response: See Master Response A.

111

Comment: Objection to the inclusion of parcel 137-061-042 (Brody Ranch) within the 100-year Flood Boundary. Recent improvements to Corona Creek including the installation of 3-72-inch pipes under the Northwest Pacific Railroad increased its capacity to 500-year level. A Letter of Map Revision was filed by the City and approved by FEMA. It appears that the XP-SWMM model is based on a peak 100-year flow of 600 cfs in Corona Creek, but the FEMA 100-year discharge is 468 cfs and the 500-year discharge is 560 cfs. The use of 600 cfs is questioned.

Response: The XP-SWMM model computes hydrology as well as hydraulics. The 100-year discharges that were used in previous FEMA studies will ultimately be superseded by the XP-SWMM discharges when the FEMA mapping phase is completed. The 100-year discharge upstream of the railroad bridge in the XP-SWMM model is not 600 cfs—it is closer to 525 cfs, increasing to about 560 cfs at Sonoma Mountain Parkway. Therefore, the XP-SWMM discharge estimates and the resulting 100-year Flood Boundary are not overly conservative.

112

Comment: Reduction in upstream detention may cause flood flows that overwhelm flood protection provided by the City's flood project downstream (Payran Reach). Loss of flood detention at Denman Flat would also aggravate existing flood hazards in the reach upstream of Lynch Creek, upstream of the federal flood protection project.

Response: See response to comment 71A.

Response

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113 A		<p>Comment: Previously requested land use revisions to land use designation.</p> <p>Response: The General Plan work effort was initiated when a Mixed Use project was being presented by the property owners for the DSL site. The early General Plan analysis incorporated that development opportunity. Final direction from the City Council was to retain the Mixed Use designation.</p>
113 B		<p>Comment: Land use designation of community commercial is exactly the type and intensity envisioned within the existing General Plan and the Draft General Plan 2025 for the DSL properties.</p>
114 A		<p>Response: Comment Noted. Council direction for the DSL site was for Mixed Use.</p> <p>Comment: Supports Mixed Use land use designation along E. Washington Street but recommends allowing all retail on the previous site of Kenilworth Junior High School.</p>
114 B		<p>Response: Comment Noted.</p> <p>Comment: Regarding 3-P-103 require development on sites greater than ¼ acre in size to demonstrate no net increase in peak-day storm water run-off. Recommends adding green building principle working “to the extent practical and financially feasible”.</p> <p>Response: Recommendation noted; Policy moved from Chapter 3 Community Design to Chapter 8 Water Resources and amended to add additional language.</p>
	✓	<p>Policy 3-P-103 from Draft General Plan moved from Chapter 3 Community Design to Chapter 8 Water Resources and amended to add additional language “to the extent deemed practical and feasible”.</p>
114 C		<p>Comment: Regarding 4-P-7 and 6-P-19 regarding requirement to replace trees at a ratio of five (24” box or larger) for every significant tree removed at a project site.</p> <p>Response: Comment noted; wording revised.</p>
	✓	<p>Policy 4-P-6, Program A revised to read “Require planting of trees for every significant tree removed at a project site. Replacement planting may occur on the project site or on a publicly owned area, with long-term maintenance assured.</p>
114 D		<p>Comment: Request for clarification of 3 acre park designation at “Kenilworth” whether this designation is for the swim center.</p> <p>Response: The 3-acre park designation covers the Library, Teen Center and existing Kenilworth Park.</p>
114 E		<p>Comment: P-11 suggests creating 2 acres of park at the former Kenilworth school site, not in support of this designation. Combined with Comment D this required dedication is excessive, in violation of the Quimby Act.</p>
		<p>Response: Comment noted, park designation was determined by the Recreation, Music and Parks Commission assuming the Mixed Use designation of the former Kenilworth school site included a residential component.</p>
114 F		<p>Comment: Suggest additional policy and program to facilitate replacing public turf fields with synthetic fields, where appropriate; this work could be done by development.</p> <p>Response: Comment noted; that option remains available to the Parks & Recreation</p>

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- 115 A Department and the Recreation, Music and Parks Commission.
Comment: The proposed terracing and channelization of tributary streams and the Willow Brook and Corona reach of the upper Petaluma River basin will dangerously reduce floodwater storage by draining the Denman Flats and Willow Brook floodplain overflow areas. This will increase the amount and height of water flowing downstream.
Response: The City is not proposing channelization of any tributaries or Willow Brook. As discussed in the response to comment 71A, the floodwater storage in Denman Flats is not reduced by proposed terracing and detention projects and the small increases downstream more than justify the substantial reductions upstream. The comment seems to condemn the draining of “Willow Brook floodplain overflow areas” without acknowledging that downstream of Ely Road the left overbank of Willow Brook is a developed area—not a natural floodplain. The City is striving to prevent flooding in this area and would consider the terracing and detention projects successful if flooding was contained within the banks of Willow Brook and the Petaluma River without causing additional flooding downstream.
- 115 B **Comment:** Proposed channelization of tributary streams will reduce floodwater storage by draining Denman Flats and Willow Brook floodplain and will increase the amount and height of water flowing downstream.
Response: See response to comment 71A. The City is not proposing to drain Denman Flat. The storage provided by Denman Flat has been accounted for in the XP-SWMM model cross section dimensions along Liberty, Wiggins, Wilson, and Marin Creeks. As a result, hydrographs in the model are attenuated during the dynamic wave routing calculations to account for the storage available in Denman Flats.
- 115 C **Comment:** Upstream channelization is not accommodated in the flood project’s design, nor is upstream basin development beyond what was anticipated in the 1987 General Plan.
Response: The statements in this comment are false. The Corps project anticipated upstream channelization. In addition, the 2025 buildout conditions have less development than assumed by the Corps in the 1987 projected buildout scenario. A discussion of the hydraulic effect of buildout conditions versus existing conditions is provided in the response to comment 70DD.
- 115 D **Comment:** According to modeling for the Chelsea Outlet Village expansion project, 100-year flood elevations have increased 1-4 feet in the past 20 years and the aerial extent of the floodplain has also increased dramatically. This is not represented in the modeling and mapping in the DEIR.
Response: We question the original FEMA mapping because the hydrology probably didn’t account for the high imperviousness in some areas of the City that became apparent during our calibration of the XP-SWMM model, and the breakout from Willow Brook was probably oversimplified. The increase identified by Phillip Williams and Associates (PWA) was not necessarily due to development, but more likely due to the limitations of the original FEMA study. In addition, the PWA modeling for the Chelsea Outlet Village expansion project was based on the Corps hydrology, which was not calibrated to the recent New Year’s Flood, and the PWA model did not extend upstream past the Willow Brook confluence. From our brief

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review of the PWA model, it was limited to hydraulic model calibration of the 1998 storm based on adjustment of channel roughness. We question the findings of significant increases in the last 20 years, because neither model in that comparison included calibration to the New Year's Flood event, which was larger than the 1998 event. In addition, the complex interaction between Willow Brook discharges, breakout flows from Willow Brook, and other tributary combinations with the Petaluma River were largely ignored. The XP-SWMM model is believed to be the first to incorporate these complex interactions in a City-wide model.

115 E **Comment:** All upper River floodplain storage must be increased and protected—not drained as proposed in the General Plan and DEIR—and existing buildings removed or flood proofed. New development is self-destructive behavior.

Response: The General Plan and DEIR do not propose draining the upper Petaluma River or Denman Flat storage. See response to comment 71A and Master Response B. See Response 110M.

115 F **Comment:** Every engineering prediction for flood levels in Petaluma since 1965 has been understated and wrong. Modeling for the General Plan and DEIR continues in that sad tradition. The only exception was modeling done by PWA for the Outlet Mall expansion which showed that the upper Petaluma River flood levels have increased 3-4 feet.

Response: Models are only as good as their input data, and we understand the assumptions/limitations of the current modeling effort. The model has proven to be a well-calibrated and reliable tool and beneficial for evaluating not only the impact of the General Plan but the feasibility of proposed channel terracing and detention basins. For discussion of PWA modeling, refer to the response to comment 115D.

115 G **Comment:** The General Plan and DEIR do not indicate whether the current modeling includes data from the Feb. 1998 storm events in its calibration, and how the model would account for and predict the flooding levels of that storm. It is not stated in the DEIR what the December 2005 storm recurrence levels were assumed to be. If there was a modeling run and mapping done to comport with the storm data, it should be presented to the public.

Response: The Feb 1998 storm was smaller than the New Year's storm of December 31, 2005. Recurrence levels are based on the statistical analysis of gage data and hypothetical storms are modeled differently than gauged storms. A rainfall distribution is assumed for hypothetical storms, but for the New Years Storm, actual rainfall was entered into the model from every available gage in the watershed. We estimate that the New Year's Storm was slightly less than but very close to a 100-year return interval event based on a comparison of model discharge results (New Year's storm versus 100-year storm) at Corona Road and Payran Street. The 100-year Flood Boundary maps for existing and buildout conditions were included in the DEIR as Figures 3.6-3 and 3.6-4.

115 H **Comment:** Additional channel and drainage work for Marin Creek and other tributary streams have not been included in the modeling as currently planned by Zone 2A, SCWA. This expected reduction of Denman Flats and tributary streams storm water storage and change of flows is critical to determining the validity and consistency of the General Plan and the

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impacts of buildout as predicted in the DEIR.

Response: The City has provided the XP-SWMM model to the Sonoma County Water Agency for their use in evaluating the proposed project.

115 I

Comment: We must implement a basin-wide (city and county) requirement for zero-net increment in stormwater runoff both in volume and timing. The proposed detention and retention basins are not sufficient to make up for floodplain storage already lost, no less for new development.

Response: While it appears correct to require stormwater runoff from developed areas to not increase the volume and timing, there is a possibility that speeding up the timing in some areas could be beneficial relative to the timing of the larger river peak. Therefore, the City plans on using the XP-SWMM model, which accounts for volume and timing of hydrographs, and sound engineering principles to guide future recommendations pertaining to development requirements.

115 J

Comment: While clearing obstructions from streams to allow passage of flood flows the City and SCWA must also allow for stream-side growth and habitat improvements for the health of the steelhead, salmon, and wildlife. Rather than cleaning out sediment from streams we should allow some local flooding and keep development away from streams with buffer zones.

The City and SCWA must also allow for stream-side growth and habitat improvements to provide shade needed to keep streams cool. Development must be kept back from streams and floodplains with well enforced buffer zones.

Response: Habitat is not enhanced by flooding adjacent developed areas due to the resulting degradation of water quality. Floodplain management requires the balancing of habitat needs with the practical aspect of preventing future flood damage. The creeks are not going to be “stripped” of trees or other vegetation in the proposed terracing concept. There will always be debris produced during large storms in this watershed, and the XP-SWMM model is accounting for significant debris obstructions at bridges, based on calibration to the New Year’s Flood.

115 K

Comment: The DEIR and General Plan must indicate what programs and policies will be used to bring tributaries and the Petaluma River into equilibrium conditions over the next 20 years to reduce future flood, physical, and economic damages, as well as reduce future maintenance operations, damages to the environment, and costs. This is ignored in the DEIR and General Plan yet represent significant adverse, current, and cumulative impacts if not accomplished.

Response: Programs and policies pertaining to stream sediment removal are regional in nature which the Sonoma County Water Agency is currently coordinating.

115 L

Comment: The County has still not required or implemented even the minimal zero-net fill requirements in designated floodplains, including the removal of illegal fill at the old Adobe Lumber site, Auction Yard and along Stony Point Road.

Response: The City of Petaluma continues to be on record for supporting Council implementation of zero-net fill. See Policies 8-P-X, now renumbered to 8-P-33 through 8-P-35..

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115 M

Comment: The XP-SWMM model must be re-run and the DEIR re-written, re-released, and recirculated to allow comments. The modeling runs must show alternative scenarios, such as continued losses or increases of Denman Flats storage capacity, with and without channelization and terracing, the results of a policy of zero-net increment in stormwater runoff on a parcel-by-parcel basis, implementation of zero-net fill in county jurisdictions, the use of existing floodplains for storage and overflows, with or without future development upstream and/or in the Corona Reach. The impacts of fill in the Rainier Interchange and Cross-town Connector must also be shown as well as its impacts.

Response: See responses to comments 115A through 115L. We do not agree that updating the XP-SWMM model is necessary. In response to the request for a parcel-by-parcel analysis see response to comment 70DD. The model does include existing floodplains for storage and overflows with and without future development. The lower Denman Reach is constructed and is part of both existing and buildout conditions. The impacts of fill in the Rainier Interchange are unknown and will have to be mitigated.

115 N

Comment: Mapping of the model runs should demonstrate the difference between current conditions and those expected at the end of the General Plan's lifespan.

Response: The difference is negligible as illustrated in Figures 3.6-3 and 3.6-4. See response to comment 115G.

115 O

Comment: Awaiting the FEIR for any such corrections of erroneous data of this magnitude would deprive the interested public, property owners, and agencies of a chance to provide meaningful comments on critical information.

Response: The City disagrees with the commenter's conclusion. See Responses 115A-115N. The XP-SWMM model is a tool that will help the City make informed floodplain management decisions, such as providing insight into the nature of flooding in the City – where it happens first, the high runoff potential upstream of Willow Brook and the Petaluma River, and the importance of accurately estimating the timing and volume of hydrographs in guiding future floodplain management decisions such as terracing and detention.

115 P

Comment: Failure to implement an aggressive, long-term integrated floodplain management strategy will lead to the inevitable; many more millions of dollars in future losses, and eventual loss of life.

Response: Comment noted, respectfully disagree. Long term floodplain management is supported through the Water Resources Element of the Draft General Plan with specific policies and programs to implement long-term strategic regional watershed improvements to reduce flooding depth and frequency. As outlined in the General Plan 2025 document and the DEIR, the City is proposing a more integrated floodplain management strategy through the adoption of policies calling for regional analysis and implementation of regional flood reduction improvements.

116 A

Comment: Trouble with format of combined hearings on the Draft General Plan and Draft EIR. Current hearing process and agendas frustrate public involvement that is required by CEQA and CEQA Guidelines. Conjoint hearings produce unstable and unclear project

Response

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		definitions.
116 B		Response: See Response 48 A. Comment: Process violates Petaluma Environmental Review Guidelines, and fails to identify comments on the DEIR for requisite responses.
116 C		Response: See Response 48 A. Comment: Agendas and public notices vague, agenda items co-mingled and confusing.
116 D		Response: See Response 48 A. Comment: New public review period and hearing formats required. Hearings should be restarted at the Planning Commission and City Council.
117		Response: See Response 48 A Comment: Copy of Notice of Preparation (NOP) dated August 11, 2004 including Distribution List. Comments received on the Notice of Preparation are cross-referenced and/or included herein.
118 A		Response: Not applicable Comment: NOP Response. DEIR should take into account the Rohnert Park General Plan and its associated growth. Response: Comment noted and taken into account in preparation of Draft General Plan and DEIR.
118 B		Comment: Traffic generated by City of Petaluma will impact the regional circulation system. Traffic analysis should include regional intersections and the potential Graton Rancheria casino. Response: See Responses 93 A-E and Master Response D.
118 C		Comment: The City traffic analysis should use the updated Sonoma County information. Response: See Responses 93 A-E.
118 D		Comment: Expect that the City General Plan will include a policy to participate in regional transportation planning and implementation (includes reference to Rohnert Park General Plan). Response: Comment noted; see Policy 5-P-12 and associated programs for implementation of Goal 5-G-3 "Recognize Petaluma's role in the regional mobility system".
118 E		Comment: Water and sewer capacity to serve new development is a critical concern; DEIR should contain a complete analysis of present and future water and sewer systems needs and the availability of resources and facilities. Response: Potable water needs (demand and supply) for all land use included within the Draft General Plan 2025 is included in the City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025. The capacity of the potable water distribution system including all pipelines, storage reservoirs, and pumping stations to serve the potable water customers is included in the City's Water Master Plan also made part of the Draft General Plan 2025. The City is in the process of constructing the new Ellis Creek Water Recycling Facility for wastewater treatment and recycled water

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production. The wastewater collection system and its associated facilities including pipelines and pump stations are included in the City's Wastewater Master Plan made part of the Draft General Plan 2025.

118 F

Comment: Regional air quality impacts from proposed growth should be assessed and appropriate mitigation recommended.

Response: The BAAQMD CEQA Guidelines has specific approaches for assessing the air quality impacts of plans, which rely on the examining the amount of growth and VMT relative to the region's growth forecasts. The Draft EIR followed this established assessment methodology.

Pollutants not meeting federal and state standards are evaluated on a regional level. The Bay Area Air Quality Management District (BAAQMD) Region currently violates federal and state standards for ozone (O₃). The General Plan's impacts on regional ozone levels resulting from growth under the General Plan are assessed in the Draft EIR, Chapter 3.10 (Air Quality). Specifically, Impact 3.10-1 (page 3.10-8 to 11) identifies measures that would ensure compliance with the BAAQMD's 2005 Ozone Strategy, including "pedestrian-scaled design and circulation policies to promote use of alternative transportation such as bicycling, bus transit, and carpooling and would include policies encouraging transit-oriented development and TDM measures." The cumulative air quality impact analysis (Impact 3.10-3) concludes that "the proposed General Plan would be consistent with the 2005 Ozone Strategy measures and programs and would not result in a cumulatively considerable net increase of one or more criteria pollutants for which the project region is in non-attainment under an applicable federal or State ambient air quality standard, and this impact would be less than significant (page 3.10-13).

118 G

Comment: Solid waste disposal needs should be assessed and the needed facilities to meet these needs should be identified. Increased opportunities for reuse and recycling should be

Response: The Draft EIR includes a discussion of solid waste planning in Section 3.5, Utilities, of the Draft EIR and under the discussion for Impact 3.5-6. As noted in the Draft EIR, solid waste is currently managed by Sonoma County Waste Management Authority, who disposes of wastes to several landfills. Because wastes are distributed to different facilities with ample permitted capacity, the contributions of Petaluma at full buildout of the proposed General Plan would be expected to be less than significant. See also Response to Comment 62 A for further discussion of this issue.

119 A

Comment: NOP Response. An assessment of the flora and fauna, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats, should be provided.

Response: Note that comment is dated 2004 and was offered in response to the NOP. The preparers of the EIR had anticipated the guidance offered by this letter in performing a citywide biological study in which all relevant plant and wildlife species that could be affected were identified. Figure 3.8-1 and Table 3.8-1 addresses all special status species with the

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potential to occur in the planning area. Their habitat and requirements and local conditions are described in detail in Appendix F to the Draft EIR. Regarding the request for additional assessment, the Draft EIR provides a programmatic evaluation of impacts, appropriate to this kind of EIR. Project specific EIR's and/or Mitigated Negative Declarations (MNDs) would analyze construction and project impacts in greater detail, and would include site-specific mitigation measures that can only be identified at the project level. The GP EIR appropriately presents and analyzes impacts on a programmatic level. More detailed assessments of flora and fauna will be analyzed at the project level environmental review, where appropriate mitigation measures can be formulated and implemented. See also Response to Comment 75 D and 110 O.

119 B

Comment: Permit required if the project has the potential to result in take of species of plants or animals listed under CESA, either during construction or over the life of the project.

Response: Environmental Impact Reports prepared for General Plan Updates provide information and analysis of impacts at a programmatic level. The comment refers to a project-level action. There are no physical impacts associated with the planning document, and therefore, there would be no take of any special status plant or animals species associated with it. Project level CEQA analyses would be conducted for individual projects within the planning area. They would include analysis of potential impacts to special status species and offer appropriate mitigation measures that can be formulated and implemented at the project level. See also Response to Comment 110 O.

119 C

Comment: A streambed Alteration Agreement may be required for any project that will divert or obstruct the natural flow, or change the bed, channel, or bank.

Response: Comment noted; the City has in the past worked closely and respectfully with the Department of Fish and Game to obtain early consultations on proposed projects and to obtain all necessary permits.

120 A

Comment: NOP Response. DEIR should consider development in the South Petaluma Boulevard Industrial area and water supply thereto.

Response: The Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025 includes all demand and supply to serve the users shown on Potable Water Use Map 2025, which is shown in Figure 1-2 of the WD&SA report and includes the area in question. The area in question is currently not served by the Petaluma system per Figure 1-1 of the WD&SA report and is shown as commercial/industrial/office. Appendix B of the WD&SA report indicates that this area is estimated to be served by the City of Petaluma under Tiers 5 and 7.

120 B

Comment: Draft Specific Plan prepared in December 1991, comments dated January 22, 1992 remain pertinent. History of water provisions to the subject area included.

Response: See response to #120 A.

121 A &
B

Comment: NOP Response (2004). In addition to new junior high and high schools, as the City grows some of our feeder elementary school districts (Waugh and Old Adobe) will need to build elementary schools to meet the increase in student population in their attendance areas.

Response: Future school locations are addressed within the context of any expansions to the

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Urban Growth Boundary, see Policy 7-P-16, which reads: "Should expansion of the UGB occur a priority shall be given to analyzing whether new school sites are needed; and if needed, shall be preserved for future school development.

122 A

Comment: NOP Response. Constraints regarding implementation of SCWA's Water Supply and Transmission System Project (WSTSP).

Response: See Responses 69 A & B.

122 B

Comment: Need to coordinate operations and maintenance of existing improved stormwater channels and establish a stream maintenance program allows the existence of a low flow channel.

Response: The existing open channel creek and river system is maintained by either Sonoma County Water Agency through maintenance easements, or the City of Petaluma. In a few instances, private property owners are responsible for maintenance of private owned sections of creek corridors. The City continually monitors and maintains open channels and works with the Sonoma County Water Agency to annually identify the open channels in need of maintenance activities. In addition, the City supports the ongoing creek and channel restoration efforts between the SCWA and the SSCRCDC, which include the re-establishment of low-flow channels to improve the stream habitat and reduce maintenance demands.

123 A

Comment: NOP response. How mitigation measures are incorporated into text policies; rationale for the planning area boundary covered by the City's GP.

Response: The Planning Referral Area or Planning Area, unchanged from the 1987 General Plan, covers the 113 square mile Petaluma River watershed basin within Sonoma County. Recognizing that the City's General Plan has no authority in the unincorporated areas, several policies and programs identify priorities of the City to be conveyed to the County in the land use and surface water management practices in the outlying County

123 B

Comment: Comments on Notice of Preparation for City's DEIR, the DEIR should address the following issues related to land use:

- Estimates of the development allowed by each land use designation category.
- Inconsistencies between the proposed plan and currently adopted plans and, particularly, the differences between the City's proposed land use plan designations and the current land use designations of the Sonoma County General Plan.
- Any plan proposals to annex and/or develop lands outside the Urban Service boundary shown on the County Land Use Plan Map.
- Impacts of proposed urban uses and recreational facilities on the adjacent agricultural and rural uses, including noise, lights, trespass, vandalism, drainage, traffic and odors. Exposure of new urban uses at the community's perimeter to the odors, chemicals and noise associated with agricultural uses.

Response: The above issues are discussed within the Draft DEIR. The City General Plan does not propose any land use changes which affect the County General Plan or area specific plans within the Planning Referral Area. The Draft EIR does not propose to annex and/or develop lands outside of the existing Urban Growth Boundary as reflected on the Sonoma County Land

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Use Map (assuming that the County map still illustrates the 1998 UGB exhibit adopted by the community ballot measure). Land uses at the community's perimeter are retained in the Rural Residential category with the lowest residential density allowed within the City. In addition, for most of the community's perimeter the Draft General Plan and DEIR contain land use designations and policies to preserve the Urban Separator as a greenbelt to separate urban and rural residential land uses within the City from County rural residential and agricultural land uses.

123 C

Comment: Comments on Notice of Preparation for City's DEIR, the DEIR should address the following issues related to open space:

- If urban development is proposed in the County's designated Community Separators, consistency with County policies for such areas.
- Building setbacks, landscaping, sign controls and other mechanisms to provide visual protection along the County-designated Scenic Corridors (Highways 101 and 116, Adobe road, Bodega Avenue, and Petaluma Hill Road).
- Limitations on development and vegetation removal to protect the biotic habitat along the County-designated riparian corridors (Petaluma river and Lichau Creek).

Response: No urban development is proposed in the County's designated Community Separators, verbal support for retention of the Community Separators remains in the City General Plan. Visual protection of Sonoma County Scenic Corridors within the City of Petaluma's authority (Highways 101 and 116 within the City) are addressed within the Community Character Element and through individual development entitlement procedures.

123 D

Comment: Long-term effects of traffic loads on major linkages serving predominantly regional traffic and inter-community trips and on road systems in the surrounding area... Daily and Peak hour traffic and levels of service for existing conditions plus traffic generated from new development, and for projected cumulative traffic levels from all projected developments in the region....Traffic mitigation measures if the City is considering additional regional retail or industrial employment which would generate additional trips, cooperative fair-share solutions to regional problems.... Special attention to impacts in the community of Penngrove and residential areas west of Petaluma.

Response: The City of Petaluma provided land use information to Sonoma County for inclusion in the County's traffic model that was used by the County to evaluate potential traffic impacts resulting from the Sonoma County General Plan 2020. Therefore, impacts on County roads resulting from future growth in Petaluma have already been evaluated in the Sonoma County General Plan 2020 DEIR. The DEIR included a discussion of County roadways significantly impacted by development (Adobe Road, Main Street in Penngrove, Petaluma Boulevard and Petaluma Hill Boulevard), and noted that growth in Petaluma will contribute to those impacts, which were identified as significant and unavoidable by the County.

123 E

Comment: Projected water needs evaluated against the City's contractual agreements, storage capacity and use of groundwater; projected wastewater evaluated against the City's capacity for collection, treatment and disposal. Proposed conservation, recycling and reuse of water

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resources.

Response: Potable water needs (demand and supply) for all land use included within the Draft General Plan 2025 is included in the City's Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City's Draft General Plan 2025. The supply evaluation to meet the demands includes contractual potable water from SCWA, City-owned groundwater, recycled water, and water conservation. The capacity of the potable water distribution system including all pipelines, storage reservoirs, and pumping stations to serve the potable water customers is included in the City's Water Master Plan also made part of the Draft General Plan 2025. The recycled water distribution system including pipelines, pump stations, and storage reservoirs in is included in the WD&SA report.

The City is in the process of constructing the new Ellis Creek Water Recycling Facility for wastewater treatment and recycled water production. The wastewater collection system and its associated facilities including pipelines and pump stations are included in the City's Wastewater Master Plan made part of the Draft General Plan 2025.

124

Comment: NOP Response (2004) Letter from California Department of Transportation (CalTrans) stating that the DEIR should include an analysis of effects on US101 and SR 116... LOS for freeway, ramps, and ramp terminal intersections... a merge/diverge performed on freeway and ramp junctions should be based on AM/PM volumes... the analysis should include individual LOS applicable to all intersection road approaches and turn movements... Mitigation measures should identify GP significant impacts.... Off ramps with vehicle queues that extend into ramps deceleration area or freeway...Vehicle queues at intersections that exceed existing lane storage...Traffic impacts that cause ramp merge/diverge LOS to be worse than Freeway LOS...Impacts that cause LOS to deteriorate below LOS E for freeways and LOS D for highways and intersections. If LOS is already "E" or "F" quantitative measure of increased queue lengths should be used to determine appropriate mitigations....Mitigation measures should consider highway and non-highway improvements and services....development of solutions and services that do not require increased highway construction. The city should consider coordinating the following possible improvements with general plan "build out" if it determined in the traffic analysis that they would be warranted. Widening interchange ramps to increase capacity. modifying ramp terminal intersections.. Adding auxiliary lanes between interchanges, increasing ramp acceleration or deceleration lane length to improve merge/diverge operations.. adding signalization and ramp intersection geometric improvements at impacted interchanges... all mitigation measures proposed should be fully discussed, including financing, scheduling, implementation responsibilities, and lead agency monitoring... funding for planned highway and transit system improvements in Petaluma have not kept pace with new growth. City should consider establishing "Fair Share" fee for developers to contribute to mitigation.

Response: Comment is noted for the record.

125

Comment: NOP Response. Petaluma Airport has an approved Master Plan, concern with any proposed changes that would jeopardize continued successful operation of the Airport.

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126 A

Response: The continued operation and economic success of the Petaluma Airport is supported by Policy 5-P-52.

Comment: NOP Response. Suggest lumping environmental needs be grouped into categories (urban development areas, buffer areas, urban development areas without buffer zones; identify environmental impacts that cross the boundaries between the three zones [water and wastewater, vehicular traffic, visual/aesthetic impacts]); inflow of impact from outside the City (Petaluma River, Traffic, Growth); impact on environment by economic conditions (residential vs. commercial vs. offices vs. vacant land).

Response: The commenter offers suggestions for structuring the EIR in a different manner, which are appreciated. CEQA has specified requirements for an EIR, set forth in the CEQA Guidelines, sections 15122-15131, which include both structural and substantive elements. The General Plan 2025 EIR contains the required CEQA elements, deals with the issues identified by the commenter although in a different structure or format, and presented the necessary information in a format designed to inform the public and decision makers about the environmental consequences of the policies, programs and goals proposed in the General Plan 2025.

126 B

Comment: Environmental considerations pursuant to Petaluma specific values (cultural, boundary between ag land and urban land, architectural aesthetic, recreation, quiet enjoyment, rate of change and interactional relationships between citizens and government, and City design and size).

Response: The commenter describes community and cultural values recommended for inclusion in the General Plan 2025. These comments relate to General Policies rather than to adequacy of the DEIR. Also, see Response 126 A.

127 A

Comment: NOP Response. Biological resources must be assessed and inclusion of a preservation component. The commenters called for “reputable biologists to assess biological resources and report them.” To this end, they furnished the most recent updated Wildlife listing on Paula Lane, along with a letter and list of avian species by Petaluma wildlife biologist Dan Nelson.

Response: See Response to Comment 75D. Table 3.8-1 has also been revised to include the special status species identified by the commenter in that letter. The biological resource analysis was prepared by trained biologists, including a botanist and a wildlife biologist.

127 B

Comment: Potential loss of open space – consideration of protection of fringe areas and existing open space while higher density development occurs in the center of Petaluma and along transit corridors.

Response: The Draft General Plan 2025 retains the Rural Residential land use classification for this area of Petaluma as well as embracing the 1987 General Plan’s concept of reducing densities from the City’s center toward the Urban Growth Boundary (feathering).

127 C

Comment: Drainage patterns into Marin Creek; wetland characteristics on property at Paula Lane and Sunset Drive.

Response: Site-specific comments on lands designated Rural Residential, minimal development

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- potential.
- 127 D** **Comment:** Traffic noise, impact of construction noise; the commenters note that traffic noise and construction noise could impact a rural neighborhood.
- Response:** The content of the comment is fully addressed by the Noise Element and by Chapter 3.9 (Noise) of the Draft EIR. In addition, the City's Noise Ordinance establishes controls on construction-related noise (see page 10-6 of the Draft General Plan). The City has established an Urban Growth Boundary around the City until 2018 to reduce urban encroachment on rural lands (page 2-12 of the Draft General Plan). General Plan Policy 10-P-9 would ensure that construction equipment is properly maintained and fitted with noise-reduction equipment. General Plan Policy 10-P-12 would ensure that the noise impact analysis for future development projects is based on the area's land use. Rural areas contain land uses where lower thresholds of noise are permitted, and therefore, the noise impact would be based on those lower thresholds. Also, Mitigation Measure 3.9(a) in the Draft EIR would reduce the impacts of construction noise on surrounding developments. The relevant policies and mitigation are cited:
- 10-P-9 Continue to require control of noise or mitigation measures for any noise-emitting construction equipment or activity.
- 10-P-12 In making a determination of impact under the California Environmental Quality Act (CEQA), consider an increase of four or more dBA to be "significant" if the resulting noise level would exceed that described as normally acceptable for the affected land use in Figure 10-3: Land Use Compatibility for Community Noise Environments.
- Mitigation Measure 3.9(a): Project developers shall require by contract specifications that construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels.
- 127 E** **Comment:** The introduction of new sources of lighting and glare in the Paula Lane neighborhood could disturb sensitive wildlife.
- Response:** Because the proposed General Plan would not significantly increase development intensities in the Paula Lane neighborhood, it would not introduce significant new sources of light and glare, adversely affecting wildlife. Existing Petaluma design policies would help to minimize the impacts of new lighting sources. For example, Section 20.36.130 in the Petaluma Municipal Code requires screening of outdoor lighting to prevent obstruction of views.
- 127 F** **Comment:** Comment contained traffic counts performed by PLAN in 2003 that showed 1175 average vehicle trips daily, holiday week, Paula Lane. Comment stated that the majority of residents desire preservation of Paula Lane its current state and management of current traffic capacity which is at maximum. Neighborhood not designed for AR-2 designation.
- Response:** Comment is noted for the record.
- 127 G** **Comment:** Potential loss of open space – consideration of protection of fringe areas and existing open space while higher density development occurs in the center of Petaluma and along transit corridors.

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- 127 H** **Response:** The Draft General Plan 2025 retains the Rural Residential land use classification for this area of Petaluma as well as embracing the 1987 General Plan's concept of reducing densities from the City's center toward the Urban Growth Boundary (feathering).
Comment: Visual/aesthetic – the Paula Lane area is one of the oldest neighborhoods and provides a transition or separator zone from suburban life to rural life...Preservation of this quality is important to the majority of both our county and city residents...The visual/aesthetic area of potential impact also correlates to the potential significant impact of loss of open space.
Response: This area of Paula Lane retains the Rural Residential land use classification. Issues of visual/aesthetic impacts are addressed in the Land Use, Community Character, and Natural Environment elements of the Draft General Plan.
- 127 I** **Comment:** Cumulative impacts – we request the cumulative impact of the above individual areas of potential significance be considered, as well. In addition, consideration of the cumulative impact of previously approved developments on the West side of Petaluma in the areas of hydrology, biological resource displacement and traffic may provide additional relevant and valuable information.
Response: The proposed General Plan will not significantly increase development in the Paula Lane area; no increase in land use development potential is included.
- 128 A** **Comment:** NOP Response. Concern related to very specific locations – traffic conditions in the vicinity of Washington – McDowell intersection and traffic capacity conditions on local streets at East Washington Street interchange.
Response: Comment noted.
- 128 B** **Comment:** Develop funding program for addressing future traffic issues.
Response: See Response 23 C.
- 128 C** **Comment:** Allow increased density in the future (relating to specific property at intersection of N. McDowell and East Washington Street).
Response: Comment noted.
- 129 A** **Comment:** NOP Response. Thank you for having meetings filmed and aired on PCA.
Response: Comment noted
- 129 B** **Comment:** Corps project will provide 100-year flood protection to year 2005 and FEMA 40-year flood event after 2040 if watershed fully developed.
Response: We have modeled with the Corps project in place with City and County buildout.
- 130 A** **Comment:** CPSP significantly flawed, in that it failed to provide sufficient protection to downtown's historic resources.
Response: Comment noted on the adequacy of the CPSP.
- 130 B** **Comment:** The comment author provided a range of proposed edits/clarifications to the narrative, goals, policies, and programs contained in Section 3.2 Historic Preservation of the Draft General Plan.
Response: Staff has reviewed the proposed edits/clarifications and made changes where appropriate to the General Plan.

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131
A - E

Comment: Clarification of comments submitted on the Cultural Resources section of the DEIR.

Response: Comments noted and Draft General Plan text amended. Review of the Historic Preservation section of the Draft General Plan with SPARC and the Planning Commissions have resulted in text amendments to Goal 3-G-3 and Policies 3-P-9 through 3-P-16 to reflect input and direction received during review of the Draft General Plan 2025 and DEIR, many of which reflect the comment author's submission. See Response 105 A-E.

132

Comment: Greenhouse gas emissions, global warming, and watershed management must be at the forefront of goals, objectives, policies and programs.

Response: This comment was submitted prior to circulation of the *Air Quality – Greenhouse Gas Emissions Draft EIR* (November 2007). Refer to the Revised Draft EIR for the analysis on greenhouse gas emissions.

133 A

Comment: General Plan must be internally consistent. Permitting unregulated big box commercial retail uses is inconsistent with existing draft goals.

Response: This comment relates to General Plan policies and does not raise an issue of significant environmental impacts or adequacy of the DEIR. As a broad-range planning document covering an extended time period, the General Plan 2025 contains and balances many goals, programs and policies. The inclusion, as the commenters note, of "strong policies and programs to protect the City's downtown and existing businesses from decline," does not mean that the General Plan's designation of sites for future retail expansion makes the General Plan inconsistent.

133 B

Comment: Council target to reduce global warming emissions by 25% below 1990 emissions by 2015.

Response: See Master Response C.

133 C

Comment: Recent case law requires assessment of individual and cumulative environmental, economic and societal impacts of large retail uses that may result in urban decay.

Response: The commenter is correct that *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) required that two project-specific EIRs for the development of large retail shopping centers should have considered the possibility of indirect physical impacts of the projects (urban decay and blight) when presented with technical studies demonstrating that those specific shopping centers could have effects on nearby existing stores potentially causing them to go out of business and in turn leading to long-term vacancies, physical deterioration or "blight-like" conditions. The *Bakersfield* court also found that construction of new shopping centers does not create a presumption of urban decay. CEQA addresses physical changes in the environment, and under CEQA "economic and social changes resulting from a project shall not be treated as significant effects on the environment." Guidelines sections [15064\(e\)](#), 15382, 15131. [Pub. Resources Code, §§ 21060.5; 21151\(b\)](#). Economic and social changes may be addressed under CEQA if they, in turn, will produce changes in the physical environment. They also may be considered with respect to the determination whether physical changes otherwise expected will be significant. But the rule remains that economic and social changes

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are not, in themselves, significant effects on the environment. *Maintain Our Desert Environment v. Town of Apple Valley* (2004) 120 Cal.App.4th 396, 420; *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1019. A physical change in the environment caused by economic and social factors attributable to a project would be an indirect physical change in the environment. (Guidelines, sec. [15064\(d\)\(2\)](#).) An indirect physical change may be considered only if it is reasonably likely to occur. A change which is speculative or unlikely to occur is not reasonably foreseeable. (Guidelines sec. [15064\(d\)\(3\)](#).) The General Plan does not require 'big box' retail at any location and does not approve any specific projects. Until specific projects are proposed, the economic and social effects of that project are inherently speculative. Any proposals for retail development will be subject to project-specific environmental review before approval, including an evaluation of whether any identified economic or social impacts relate to physical impacts which require study.

133 D **Comment:** Sustainability- Numerous goals and policies call for sustainable development and capitalization on the City's unique assets. Unregulated big box retail is contrary to these goals and policies as well.

Response: Comment noted on General Plan policies, not relative to the adequacy of the DEIR.

133 E **Comment:** Recommend requirement for Fiscal and Community Impact Report.

Response: Comment noted. See Response 164.

134 A **Comment:** Indications that growth of retail space has outstripped our population growth.

Response: Comment noted.

134 B **Comment:** Encourage General Plan wording supporting the success of local independent businesses, fostering growth of new entrepreneurs and protecting Petaluma's rich character and quality of life.

Response: Comment noted, please see Policy 9-P-2 and accompanying programs.

134 C **Comment:** Must state clearly in this plan that strong, independent and locally-owned business community is an essential precursor for aesthetic local culture and that support for the local economy is a necessary prerequisite for preserving community character and long-term economic health.

Response: Comment noted. Policies and programs in Sections 6.2 "The Arts" of the Parks and Recreation element and policies/programs within the Economic Health element of the Draft General Plan support and recognize the value of locally-owned businesses as well as cultural programs which lend support to the local economy and community character. See also Response 133C.

134 D **Comment:** Comments on the Retail Leakage Study and information from the Institute for Local Self-Reliance.

Response: This comment relates to General Plan policy rather than to adequacy of the DEIR. No further response needed.

134 E **Comment:** Internal inconsistencies of General Plan: the economic health element is inconsistent, relying heavily on old-style economic development wisdom, shortchanging

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existing independent entrepreneurs and local businesses.

Response: This comment relates to General Plan policy rather than to adequacy of the DEIR. No further response needed.

134 F

Comment: Unplanned retail growth creates blight – should regulate development to protect and enhance community character.

Response: The importance and value of community character within the framework of the General Plan is illustrated in the depth of discussion and the number of Goals, Policies and Programs within the Community Design Element. Development is closely scrutinized through the entitlement process to assure it builds upon existing community strength and economic health.

135 A

Comment: Information on Tulsa, Oklahoma flood mitigation efforts. A more comprehensive and effective model is available to guide surface water management.

Response: Comment noted; the City has selected XP-SWMM, a model authorized by the FEMA for the remapping process, and as directed by the City Council.

135 B

Comment: The Payran Reach neighborhood is now regulatory floodplain but will be eliminated or reduced after remapping occurs; these ‘former floodplains’ are still subject to overtopping of the flood project walls by storms larger than a designated 100-year event.

Response: A portion of the Payran Reach neighborhood is actually within the regulatory Floodway. The 100-year event, at buildout, does not exceed the height of the flood reduction project walls. Comment noted.

✓

DEIR amendment to policy 8-P-X, now renumbered to 8-P-33 through 8-P-35. Also, see response 110 M.

135 C

Comment: Federal policy regarding construction in the floodplain, as defined in the 1993 Galloway Report on the Mississippi floods.

Response: Comment noted; the City of Petaluma is a NFIP jurisdiction and is subject to all applicable Federal Register standards pertaining to Floodplain regulations.

136

Comment: Encourage the designation of the Scott Ranch as a rural residential property and to ensure that the historic and cultural resources on the property are not demolished or moved as part of any future development.

Response: The City Council in its review of specific land use issues directed staff to retain the Very Low Density Residential land use classification for the Scott Property, including the urban separator, open space, and proposed park designations. Council also directed staff to incorporate specific text within the Draft General Plan text regarding site-specific development constraints and standards. In addition the policies and programs contained in the Historic Preservation element will guide the project level review and evaluation of historic resources as part of any development proposal for this site.

137 A

Comment: The water supply section of the DEIR must include sufficient facts to evaluate the pros and cons of supplying the water development under the General Plan will need; an adequate environmental impact analysis cannot be limited to the water supply for a part of the

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development anticipated under the GP (deferral to Water Supply Plan); future water supplies must be reasonably likely to prove available; discussion of possible replacement or alternative supply sources and the environmental consequences of resorting to those sources; limiting development to available water is not an option.

Response: See Response 99 A.

137 B

Comment: If the DSL site is changed to community commercial, the DEIR must be revised to analyze all of the potential impacts. All land uses changes undertaken by straw vote of the Council must be re-analyzed under the new designation.

Response: The land use designation for the DSL site was retained as Mixed Use.

138

Comment: Changing the General Plan designation of Lafferty Ranch property represents the piecemealing of a larger project to open Lafferty for public access, contrary to CEQA. Sudden Oak Death Syndrome potential impacts not addressed in DEIR.

Response: An EIR for potential development of Lafferty Ranch to allow public access was certified in 2001. No action to approve the project evaluated in that EIR was taken, and the General Plan 2025 and its DEIR do not approve an access project.

The City has owned the Lafferty Ranch property since approximately 1959. City of Petaluma Resolution 2004-074 is the most recent reflection of longstanding City policy to work toward creation of a park and trail system of regional significance on Sonoma Mountain. The County of Sonoma Draft General Plan 2020 continues to show a regional park in the vicinity of Lafferty Ranch property, similar to its designation since the County's first Recreation Plan in 1964. General Plan 2025 and DEIR statements about Lafferty merely recognize this long-standing policy, do not change Lafferty's prospective use, do not approve any specific access to or use of Lafferty Ranch and do not create any new or more significant environmental impacts compared to existing conditions. The DEIR states merely that, "Lafferty Ranch is City-owned property that would provide access to hiking trails on Sonoma Mountain for the greater Sonoma County area, should development of minimal facilities be achieved to allow public access." (Emphasis added, Draft General Plan, pg 6-8.). The General Plan, as a broad programmatic planning document is not the vehicle for a complete environmental analysis of all possible specific impacts from future development on a specific site when and if that development is proposed.

✓

DEIR Page 3.3-14 is amended to reflect the modification of Policies relative to the separation of Tolay Lake as a regional park and Lafferty Ranch as a City-owned open space property. Also see Responses #90 A-C.

139

Comment: Modify General Plan to emphasize more promising regional park and trail opportunities such as Tolay Park and other locations in the Sonoma Mountain area consistent with the forthcoming Sonoma County Recreation Plan.

Response: General Plan comment noted; the policy has been amended to separate the wishes and intent of Sonoma County for Tolay Park from any possible future use of Lafferty Ranch as a regional asset.

140

Comment: Support for letter from National Trust for Historic Preservation (see comment

Response

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#130).

Response: See Response #130.

141

Comment: Support for Comment #130; and suggested General Plan text revisions.

Response: See Response #130.

142

Comment: Waste of potable water on lawns, sidewalks, and roadways (including pictures of water wasters); suggested text amendments.

Response: The City currently has water waster regulations, enforced diligently by the Department of Water Resources & Conservation.

143

Duplicate page removed

144

Comment: DEIR and General Plan must meet the standards specified by the California Supreme Court in the *Vineyard Areas Citizens for Responsible Growth, Inc. v City of Rancho Cordova et al.*

Response: The City agrees that the City must comply with the law as defined by the *Vineyard* case. The *Vineyard* case approved Rancho Cordova's environmental study of available water for a specific plan involving 9886 residential units over 2600 acres, despite some competing claims for water agency supply in the regional area; but found inadequate the analysis of future supply for the long-range development of the remainder of the project which totaled more than 22,000 residential units and 6,000 acres. The main thrust of the case is that study of long term water supply solutions can not be deferred for future analysis and that future water supplies identified and analyzed must bear a likelihood of actually proving available. The *Vineyard* case expressly does not require that an EIR outline 'guaranteed' sources of water and allows somewhat less certainty (a "likelihood" of availability) for long range planning (i.e. the City's General Plan 2025) than for short term supplies and specific project approvals. Where there is uncertainty about future supply, alternative sources of supply must be identified and the environmental consequences of those sources evaluated. The General Plan 2025 DEIR acknowledges a degree of uncertainty in the ability of the City's historic primary water source, the Sonoma County Water Agency, to provide additional water to serve buildout over the long term horizon of the General Plan and analyzes the alternative programs which will provide that water. The recycled water and conservation program which will provide the alternative sources of water needed for long term buildout under the General Plan 2025 is analyzed in DEIR, Appendix C and studied on a program level in the General Plan 2025 DEIR. The Water Recycling Expansion Program is being further studied on a project level through preparation of a WREP DEIR, now in the final stages of drafting. Approval of the WREP DEIR will precede any activities to acquire and construct the recycled water infrastructure necessary to carry out the program. The General Plan 2025 and its environmental studies also provide, as a backup to the analysis of water supply, that development may be curtailed if the available sources of water do not keep pace with the level of development, (DEIR reference, GP policies (8-P-4 through 8-P-7))

145

Comment: Global warming information, encouraging use of proper language in General Plan.

Response

DRAFT EIR Comment #	DEIR/DEIR Revision	<i>Note: Please refer to the full set of Comments on the Draft EIR for the complete comment; comment summary contained herein is intended for general information only.</i>
146		<p>Response: The attachment of a legal article outlined action taken by the State Attorney General's office regarding global warming. The State AG reviewed the City's Revised DEIR for Greenhouse Gas Emissions and provided comments (see comment #168).</p> <p>Comment: Photos of wetlands and habitat on the DSL site.</p>
147		<p>Response: The comment does not question the analysis in the Draft EIR but rather provides additional documentation on the biological resources discussed therein. The commenter requests that the photos be reviewed by the California Department of Fish and Game. As suggested, the Final EIR shall be forwarded to this resource agency. No further response is required.</p> <p>Comment: Greenhouse Gas Emissions comments, excerpted information from AEP and background information.</p>
148 A		<p>Response: This comment was submitted prior to circulation of the <i>Air Quality – Greenhouse Gas Emissions Draft EIR</i> (November 2007). Refer to the Revised Draft EIR for the analysis on greenhouse gas emissions.</p> <p>Comment: Water conservation information (SCWA irrigation program).</p>
148 B		<p>Response: The City adopted its Water Conservation Plan in January 2008.</p> <p>Comment: General Plan Land Use Element must include an exhibit showing areas covered by the Plan which are covered by flooding.</p>
148 C		<p>Response: The exhibit has been amended to include the boundary delineation. It was included as a separate exhibit in the Draft EIR to allow better clarity of information. The official General Plan Land Use Map will continue to illustrate the 1989 regulatory FEMA floodplain and floodway until map amendment is achieved.</p> <p>Comment: Hazard Mitigation Plan must be added to the Safety element per the ABAG – DEMA approved Hazard Mitigation Plan.</p>
149 A		<p>Response: The City has reviewed, evaluated and taken into consideration all adopted regional Hazard Mitigation Plans.</p> <p>Comment: Support for Urban Growth Boundary.</p>
149 B		<p>Response: Comment noted.</p> <p>Comment: Concern that each of three alternatives call for an expansion of Petaluma's Urban Growth Boundary.</p>
150 A		<p>Response: The comment is incorrect; the General Plan and DEIR both assume that the Urban Growth Boundary remains in affect for the term of the General Plan, until 2025. No planned expansion into the "possible expansion areas", identified in the UGB ballot measure, are included in the General Plan or DEIR.</p> <p>Comment: Policy 3-P-113 regarding no net increase in peak-day stormwater runoff was not moved to Chapter 8 – Water Resources.</p> <p>Response: Comment noted, the Policy will be moved from Chapter 3 to Chapter 8 in the final General Plan document.</p>
150 B		<p>Comment: Please define "community needs" in Goal 8-G-8.</p>

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150 C

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Response: Goal 8-G-8 in the Draft General Plan read: “Provide surface drainage and flood protection facilities to meet the community’s needs, has been rewritten to provide better clarity of purpose.

The following text is added to Goal 8-G-8, “...of reducing flood hazards and potential of property damage.”

Comment: What agencies require permits for the City to modify a creek channel? What is the design and how will the flood terrace system be constructed. What are the identified physical improvements?

Response: Dependent upon the scope of work permits may be required through the State Department of Fish and Game, the Army Corps of Engineers, and/or the Department of Fish and Wildlife. The scope of the first City created terrace project on Industrial Avenue, just north of Corona Road, included studies to determine value of existing habitat and degree of non-native, invasive plant species needing removal; working with the Resource Conservation District those invasive, non-native plants were removed from the river corridor. The existing riverbank plants were preserved and a flood terrace was created just beyond that plant corridor to allow mid-range bank flows to travel across the flood terrace, thereby slightly reducing flood elevations in the immediate area.

Comments #151 through #161 are verbal comments and are found on DEIR comment pages G and H.

151

Comment: Greenhouse Gas Emissions; creating walkable communities encourages public transportation

Response: This comment was submitted prior to circulation of the *Air Quality – Greenhouse Gas Emissions Draft EIR* (November 2007). Refer to the Revised Draft EIR for the analysis on greenhouse gas emissions.

152

Comment: Impacts of DSL site; DEIR uses mixed-use for the site for traffic model, water demand studies, community design and sustainable building goals.

Response: Statement is correct; and the General Plan Land Use Map provides for a Mixed-Use land use designation for the DSL site..

153

Comment: Base flood elevation is 3 feet higher than the old FEMA flood maps.

Response: The effective FEMA Flood Insurance Rate Maps (FIRMs) are currently in the process of being revised to reflect the effect of the Corps project as well as a higher level of detail throughout the City due to better topographic data and modeling methods. In addition, the published FEMA elevations are based on the NGVD 1929 vertical datum. The XP-SWMM model is based on the NAVD 1988 vertical datum, which is about 2.7 feet higher than NGVD 1929 in Petaluma.

154

Comment: Need for a northbound onramp for the East Washington Street interchange. Rainier will induce development in the floodplain.

Response: The northbound onramp is a planned improvement included in the City Capital

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- Improvement Program and coordination is ongoing for project design and implementation with CalTrans. The potential development in the area of the Rainier cross-town connector is addressed within the various sections of the DEIR; mitigations through development constraints for any development potential have been incorporated through the identification of the Petaluma River Corridor and the prohibition of development within areas subject to floodwater depths greater than 1’.
- 155** **Comment:** Not enough water and infrastructure available for development; just because its vacant doesn’t been its buildable.
Response: Potable water needs (demand and supply) for all land use included within the Draft General Plan 2025 is included in the City’s Water Demand and Supply Analysis (WD&SA) report dated June 2006 which is made part of the City’s Draft General Plan 2025. The WD&SA report establishes demands for the land use shown and provides for potable water supply to meet the demands.
- 156** **Comment:** Support for letter written by National Trust for Historic Preservation (see Comment #130).
Response: See response to #130. Comment noted.
- 157** **Comment:** Civic economics – money spent at local businesses recirculates 3 times in community.
Response: Comment noted.
- 158** **Comment:** Flooding and projected water levels over the next fifty years.
Response: See Master Response B.
- 159** **Comment:** Projects built “above flood level” have flooded since they were built – don’t build in floodplain. EIR’s don’t work, just guessing.
Response: Comment noted, see Master Response B.
- 160** **Comment:** Site specific comments on the proposed Regency site (old Kenilworth Junior High School site) requesting the undertaking of fiscal, neighborhood needs, smart growth, employment, health impact, and housing assessments.
Response: Comment on specific project noted.
- 161** **Comment:** Sonoma County PRMD staff report and exhibits dated July 25, 2006 regarding area plan amendments and two exhibits for the West Petaluma Area Plan and the Petaluma Dairy Belt Area Plan.
Response: Staff report and exhibits accepted. Growth patterns compatible with the two Area Plans were incorporated into the DEIR as part of the cumulative impacts associated with regional growth as identified within the Sonoma County General Plan.
- 162** **Comment:** Flooding along Kelly Creek and sea level rise concerns, frequency of 100 year storm events.
Response: The XP-SWMM model for Kelly Creek includes a partial diversion of creek flow to a 5-foot diameter storm drain at Sunnyslope Drive. With this diversion included in the model, the 100-year discharge is essentially contained within the stream banks for both existing and

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buildout conditions.

163 **Comment:** BCDC report on sea level rise.

Response: See Master Response B.

164 **Comment:** CIR's needed for development with outline of basic elements.

Response: This comment relates to General Plan policy. The DEIR is not required to include or evaluate community impact reports. However, the City Council is considering policies which could require Community Impact Reports separately from the General Plan effort, through direction to the Community Development Department.

165 **Comment:** Excerpts from West Petaluma Specific Plan and Sonoma County correspondence

Response: Comment and acknowledgement of exhibits.

COMMENTS ON REVISED DRAFT EIR – GREENHOUSE GAS EMISSIONS

166 **Comment:** Fire safety element standard GP recommendations

Response: The City has reviewed, evaluated and taken into consideration all adopted fire safety Plans and Standards.

167 **Comment:** The Party's Over – greenhouse gas emissions, excerpt from Sydney Morning Herald and specific suggestions regarding Home Occupation Permits and encouraging aggressive approach to GHG reduction.

Response: See Master Response C.

168 **Comment:** Air Quality: Greenhouse Gas Emissions background information and specific CEQA requirements, proposed mitigation measures (smart growth, mandatory Mixed Use, identify additional Mixed Use sites, incentives for mixed-use development; increase single family dwelling densities; add policy to require high end of density ranges; adopt a Heat Island Mitigation Plan, strengthen policies to support increase of walking, biking and carpooling to schools, etc.; enforce TDM policies, funding infrastructure improvements in mixed use and high density areas; require Climate Action Plan; require leadership and guidance to specific GHG reduction policies; provide time-frame for green building ordinance; recycling for all buildings;;.

A - U

Responses: Comments noted and appreciated. Comment are based on review the Revised Draft EIR, the commenter did not have the advantage of reviewing the Draft EIR or the four volumes of Technical Appendices. Responses are provided to correlate the comment to the applicable General Plan text, policies and programs already incorporated into the draft document.

A. Smart growth principles and mixed use development. The Draft General Plan guides the City strongly into more aggressively pursuing smart growth principles and significantly increased the mixed-use acreage within the City. Densities were increased as appropriate along transit-served corridors and in area in proximity to community-serving commercial.

- Mandatory Mixed Uses: The Mixed-Use definition "...requires a combination of

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uses...”

- Identify Additional Mixed-Use Sites: comment noted. The Draft Land Use Map was reviewed by the community through public workshops and hearings over a fifteen-month period. Significant increases to the amount of mixed use was included in the Draft Plan. In addition, along major arterial corridors, mixed-use is permitted, through a discretionary review process, within the medium and high-density residential designations.
- Incentives for Mixed Use Development: The mixed-use definition allows the highest Floor Area Ratio (FAR) permitted with the exception of the Central Petaluma Specific Plan Area. Weighted against any additional increases is the need to ensure provision of adequate City services, including but not limited to utilities, parks and recreation facilities and services, and infrastructure. The Draft General Plan already identified many locations of strip commercial along arterial streets and amended their land use designation to Mixed-Use.
- Increase existing single family residential density: The draft General Plan did increase residential densities except at the western edge of the City, where development is constrained typically by topography and existing habitat and no transit service is available.
- Land/Use/Growth Management Element: The densities contain a minimum and a maximum; the Draft Plan increased the density for the medium and high density ranges. In addition, infill is required to be at the same or higher density as surrounding land uses.
- Heat Island Mitigation Plan. The draft General Plan mandates the preparation and adoption of a Climate Action Plan (CAP) and mandatory Green Building Standards. The suggested Heat Island Mitigation Plan could be a component of the CAP or the Green Building Standards. This options will be considered as the Development Code is prepared following adoption of the Plan.
- Strengthen policies to increase walking, biking. The Draft General Plan includes a significant update to the Bicycle and Pedestrian Plan; the Plan also includes \$38 million dollars over the life of the Plan toward bicycle and pedestrian movement improvements (see Section 5.6 of Draft Plan). The traffic impact fees to be adopted concurrently with, or shortly after, adoption of the General Plan ensure implementation of these improvements.
- Siting new schools. No new schools are sited in the Draft General Plan.
- Parking management options. The City already enforces a block face limit in the central downtown area and provide free parking in two multi-story parking structures.
- TDM. At this time the option of TDM is being explored and is not offered as a mandatory program; it would be inappropriate at this time to include implementation programs. The City Council, during deliberations on the Draft Plan opted to retain TDM as a possibility rather than mandatory measure at this time.
- Climate Action Plan. The CAP is required; the timing of which is provided in the

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Implementation Plan to be adopted with the General Plan.

- Green Building Practices. As suggested, “encourage” changed to “ensure”.
- Timeframe for mandatory green building will be identified in the Implementation Plan.
- Required recycling. Policy 4-P-21 requires all new and remodeling multi-residential and non-residential to include recycling facilities.
- Expand Policy 4-P-13. Suggestions incorporated.
- Upgrades to residential at time of sale. This issue was discussed at length by the City Council; direction given to include as voluntary. City Staff is working with local realtors to publicize options.
- New residential development – 50% with onsite solar photovoltaic systems. Included as voluntary for residential and non-residential, see Policy 4-P-19. Specifics will be included in the mandatory Green Building Program, now being developed.
- Low-interest financing for energy efficiency improvements. Suggestion added as program.

168 V

Comment: Strengthen and expand use of recycled water

Response: The General Plan includes an extensive expansion of the use of recycled water, through our Water Recycling Facility, now under construction. Also, see Volume 2, Appendix C, Water Demand and Supply Analysis Report.

✓

Minor amendments to policies and programs to reflect responses to comment #168 A – V.

169
A - J

Comment: Greenhouse Gas Emissions, specific comments on halocarbons; CEC inventories; geographical boundaries; clarification of page 3.10-23; estimate for retrofitting fixtures; measures (pg. 3.10-24) are targeting other emissions not necessarily GHG; bus replacement issue; reference to Clear Air and Climate Protection Software (reference to halocarbons); need to include more sources than just buildings, municipal services, solid waste, and transportation (i.e. industrial sources and agriculture). Airplanes and marine vessels were not included; energy usage in street lights not included; Table 3.10-7 is unclear; Table 3.10-8 renewable fuels do not necessarily reduce GHG emissions; questioned credits assumed.

Response: Setting sections are intended to provide the reader with an understanding of the past and present particulars of the issue at hand. The EIR Authors agree that some clarification to the discussion on Halocarbons is warranted. The last paragraph on page 3.10-21 is modified to read as follows:

Halocarbons: Halocarbon compounds are chemicals in which one or more carbon atoms are linked by covalent bonds with one or more halogen atoms (fluorine, chlorine, bromine or iodine). Halocarbon gas concentrations are primarily due to human activities. Halocarbons are best known as gasses that deplete the ozone layer; however many are also powerful greenhouse gases. Under the Montreal Protocol of 1987, emissions of certain halocarbons (CFCs, halons, carbon tetrachloride, methyl chloroform, HCFCs, HBFCs, and methyl bromide) are tightly controlled and concentrations of many dual ozone depleting and global warming inducing gases are

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now decreasing (IPCC, 2007b).

On page i of *Inventories of California Greenhouse Gas Emissions and Sinks: 1990 to 2004* it states “In 2004, California produced 492 million gross metric tons of carbon dioxide-equivalent GHG emissions...” However, the report also mentions that because of better inventory reporting and the availability of new information, emission projections changed from the *Inventories of California Greenhouse Gas Emissions and Sinks: 1990 to 1999* to the current 1990 to 2004 inventory. It is reasonable to assume that better reporting methods could change the estimates and projections identified in the 1990 to 2004 report as well. Therefore, the fourth paragraph on page 3.10-22 is modified to read as follows:

The California Energy Commission (CEC) estimates that in 2004 California produced 492 million metric tons of CO₂e, including emissions associated with imported electricity. The largest source of greenhouse emissions comes from the transportation sector. Combustion of fossil fuel in the transportation sector was the single largest source of California’s greenhouse gas emissions in 2004, accounting for 40.7 percent of the total greenhouse gas emissions in the state.

Land use, vehicle miles traveled, and population used for the 1990, 2005, and 2025 estimated greenhouse gas emissions were based on the City Limits in 1990 and 2005 and the expectation that City Limits in 2025 would be coincidental with the City’s Urban Growth Boundary. The “baseline” or “pre-project conditions” year for the *General Plan 2025* was set at 2005. Under CEQA a project is required to compare potential physical effects of the project to pre-project conditions. While it is unfortunate that the State currently has documented greenhouse gas emissions through 2004 only, it was the best available information to the EIR authors. In addition the EIR authors do not consider the comparison of the State’s 2004 emissions to the City’s 2005 emission an unreasonable comparison given the short time-frame between the two years. Prior to commencing with the greenhouse gas inventory it was decided to use short tons to be consistent with the earlier municipal inventory prepared in 2005. The State reports their emissions in metric tons. Rather than converting the State’s estimates to short tons then reporting those numbers, it was decided to present the numbers as they are reported by the State. This is clearly identified in Table 3.10-8 and in the text throughout the Draft EIR. Metric tons were converted to short tons only for the purpose of accurately determining percentages.

The first sentence under the heading “City of Petaluma” on page 3.10-23 is modified to read as follows:

On August 5th, 2002, the City Council adopted Resolution 2002-117 committing to participate in the Cities for Climate Protection (a program of the International Council for Local Environmental Initiatives).

The programs identified on page 3.10-24 were presented to the Petaluma City Council on September 10, 2007 during a presentation on City greenhouse gas reduction activities. They are repeated in the Draft EIR as part of the setting and are provided for informational purposes only. They are not identified as mitigation “measures” under CEQA.

The last paragraph on page 3.10-24 is modified as follows:

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The greenhouse gas emissions were determined using the Clean Air and Climate Protection Software (released May 2003). The software converts fuel types (gas, electricity, etc.) and fuel units (therms, MWh, etc.) into carbon dioxide-equivalents for CO₂, N₂O, and CH₄ (CO₂e) emissions for the California/Nevada portion of the Western Electricity Coordinating Council.

The following reference is added to the References section on page 3.10-39:

State and Territorial Air Pollution Program Administration and the Association of Local Air Pollution Control Officials, the International Council for Local Environmental Initiatives, and Torrie Smith Associates (2003). *Clean Air and Climate Protection Software*. May 2003.

Heavy Industrial and agricultural uses combined account for approximately 3% of the land within Petaluma. Therefore, emissions of greenhouse gases from local industry and agricultural are expected to be small and would not change the basic estimates for greenhouse gas emissions in 1990, 2005, and 2025. In addition, future industrial processes that may exist in Petaluma in 2025 would have been difficult to estimate. Table 3.10-6 compares existing land uses with land uses under build-out of the General Plan. The General Plan does not control what type of business is allowed to occupy a building. Having a more detailed inventory will be an important component of the Community Climate Action Plan but was not necessary for evaluation of the Draft General Plan. Urban forestry is not identified as a mitigation measure. It is identified as a State measure that is supported by various policies throughout the Draft General Plan from which Petaluma would indirectly benefit. The commenter is correct; street lights are not included in the energy use for municipal services. As indicated in Table 3.10-8 “municipal services” only includes “water & sewer” as these directly support the community and growth on the Draft General Plan. Municipal services in general are considered under the municipal greenhouse gas inventory and will be included in the Municipal Climate Action Plan. “Credit”, in the form of mitigation or greenhouse gas reduction, was not taken for switching incandescent traffic lights to LED lights as it has already occurred. It was a program implemented by the City and identified in the setting section for informational purposes only.

The Draft EIR is for the Draft General Plan, therefore reduction estimates are based on buildout of the Draft General Plan for year 2025. The commenter’s characterization of the emissions reduction from implementing a green building program are correct; emission reductions would start out small and increase over time, and potentially be greater beyond the 2025 General Plan horizon year.

The greenhouse gas emission reductions shown in Table 3.10-8 related to RPS and vehicle efficiency are those reported by the State of California. Smart Land Use and Intelligent Transportation are included *because* Petaluma has included policies and programs and the Draft General Plan that support the concepts behind Smart Land Use and Intelligent Transportation. Policies such as “support infill” are difficult to quantify in relation to greenhouse gas reductions and are therefore not accounted for in Table 3.10-7. Therefore, the State’s estimate of greenhouse gas emission reductions for Smart Land Use and Intelligent

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Transportation was used.

See notes above for DEIR page modifications and amendments; General Plan will be amended accordingly.

Comment: Air Quality, Greenhouse Gas Emissions; failure to meet Council commitment to GHG emissions reduction; vehicles miles traveled not addressed adequately; and list of potential mitigation measures (park locations and improved transit system, more aggressive programs, mandatory green building, require solar).

Response: Refer to Master Response C with regard to the comments on the City's efforts to meet the goals of Resolution 2005-118.

The Traffic Model used to determine VMT accounts for land use and street characteristics. It does not account for items such as Policy 5-P-21 Strive to create a five percent bicycle commute share by 2025. In addition, there are numerous other policies (5-P-1, 5-P-13, 5-P-15, 5-P-18 through 5-P-25, 5-P-28, 5-P-30 through 5-P-43, and 5-P-51) in Section 5 Mobility that encourage bicycle commuting, car-pooling, low-cost and accessible transit, and other forms of alternative transportation that would not be accounted for in a traffic model. Under the Traffic Model, build-out of the *Draft General Plan 2025* results in a decrease of 4.5% VMT per-capita. It is reasonable to conclude that with implementation of the additional policies mentioned above that VMT per-capita would decrease even further.

The comment contains various suggested mitigation measures. The Revised DEIR concludes that the General Plan's cumulative impact on climate change is significant and unavoidable because of the unsettled status of regulatory thresholds; the difficulty of measuring the success of national, state and local reduction measures in the City of Petaluma; and the difficulty of measuring both the effect of City measures on the global climate and the effects of global climate change elsewhere on Petaluma. Therefore, none of the suggested mitigations, if adopted, would change the impact conclusion of the Revised DEIR or allow the City to state that General Plan's cumulative impact on global climate change is reduced to a level of insignificance. Nevertheless, the FEIR responds here to comments describing individual mitigation measures, to the extent possible.

C – Creating new ballfields on the west side: Comment noted; ten new proposed parks are included on the west side (see Park Exhibit Figure 6-1).

D – Provide transit services to City's fields during afternoon games times. Comment noted; significant expansion of existing transit, bicycle, and pedestrian facilities are called for within the General Plan, including the possibility of a free transit system. One of the six primary mobility priorities, identified within the General Plan includes improving the existing bus transit system to support school and recreational schedules.

E – Comment noted on safe passage to schools. The City has an adopted Safe Routes to Schools Program and continually seeks additional funding to implement physical improvements in accordance with the adopted Plan.

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F – Shorter headway for transit buses. See Response 170.3 above.

G – On January 28th, 2008, the City adopted the Water Conservation Plan. This plan includes implementation of programs to reduce water use in existing and new development that would result in water savings of 504 MG per year by 2025. In addition, in Chapter 8 Water Resources there are numerous policies (8-P-5A, 8-P-5B, 8-P-9, 8-P-13, and 8-P-18) supporting water conservation and water recycling.

H – General Plan Policy 3-P-26 requires the implementation of a mandatory green building program. City staff is currently working on what requirements and standards will be included in the program.

I – Under the mandatory green building program (Policy 3-P-26) developers would have the option of installing solar water heating and passive solar systems, or “plumbing” for such systems, as one of the ways to earn points or credits. Whether it will be a requirement has not yet been determined. Under the *Draft General Plan 2025* flexibility is provided for how the program will be defined. The EIR Authors agree with the commenter’s suggestion regarding financial incentives for solar heating and passive solar systems. A new mitigation is added to Section 4 Natural Environment, as indicated below.

J- Cumulative global climate change impacts. Comment noted; see Master Responses B and C.

Mitigation: The following mitigation measure is added to Section 4 Natural Environment:

4-P-29 Investigate the feasibility of developing a City-sponsored program to subsidize or assist home-owners in purchasing solar water heating or passive solar systems, or other forms of renewable energy, through low-interest loans or property tax assessments.

Comment: Greenhouse Gas Emissions: Significant reductions through reduction of vehicle miles traveled, renewable energy; proposed policies and programs. Thresholds of significance and targets for reduction; analytical approach used (quantitative, qualitative, with or without significance determinations); findings of over-riding considerations; cumulative reductions without quantity of reductions for policies; specific evidence is lacking; GHG effects of City activities; environmental considerations of reaching targets through more thorough set of policies

Response: The letter dated July 17, 2007 was submitted prior to circulation of the *Air Quality – Greenhouse Gas Emissions Draft EIR* (November 2007). Please refer to the Revised Draft EIR as well as Master Response C, City Emission Reduction Goals Identified in Resolution 2005-118.

The comment contains various suggested mitigation measures. The Revised DEIR concludes that the General Plan’s cumulative impact on climate change is significant and unavoidable because of the unsettled status of regulatory thresholds; the difficulty of measuring the success of national, state and local reduction measures in the City of Petaluma; and the difficulty of measuring both the effect of City measures on the global climate and the effects of global climate change elsewhere on Petaluma. Therefore, none of the suggested mitigations, if

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adopted, would change the impact conclusion of the Revised DEIR or allow the City to state that General Plan's cumulative impact on global climate change is reduced to a level of insignificance. Nevertheless, the FEIR responds here to comments describing individual mitigation measures, to the extent possible.

P1: A revised municipal emissions inventory and a Municipal Climate Action Plan (CAP) are currently being developed by the City. General Plan Policy 4-P-21 calls for implementation of the Municipal CAP. Policy 4-P-22 creates and implements a Community CAP. CCA's (Community Choice Aggregation) and other renewable energy projects are addressed in Policies 4-P-13C, 4-P-14, and 4-P-23.

P2: Increasing municipal energy efficiency is addressed under Policies 4-P-13 and 4-P-16.

P3: CCA is addressed under Policy 4-P-13.

P4: The City is currently developing a mandatory green building program. This also is covered in the General Plan under Policies 3-P-125 and 3-P-126. The Council considered including restrictions on wood-burning fireplaces but declined to include it in the General Plan. Most discussion regarding wood-burning fireplaces to date has focused on the potential for health effects from increased particulates. Regarding the GHG emissions from wood-burning fireplaces, it is not yet established that wood-burning fireplaces together with the growing and delivery of wood emit more GHG than gas or propane heaters together with the production and delivery of gas; therefore, restriction on wood-burning fireplaces are not included as a mitigation measure for GHG. This topic is also addressed under Policy 4-P-10.

P5: The General Plan promotes the reduction of vehicle miles traveled (VMT) by virtue of various policies throughout the Elements on Land Use (mixed use, infill), Community Design (pedestrian and bicycle facilities), and Mobility (transit facilities). For a complete list of policies, see the Revised Draft EIR on pp. 3.10-29 through 31.

P6: Support for local businesses is addressed under Policy 4-P-127.

P7: Waste reduction is addressed under Policy 4-P-16. The City of Petaluma is a member of the Sonoma County Waste Management Agency which is a joint powers authority of the nine cities and the County of Sonoma. The Agency sponsors many waste recovery programs throughout the county and continues to expand on the programs. Green waste in Sonoma County is collected and taken to the Central Disposal Site for composting.

Response to the letter dated January 1, 2008:

The threshold of significance is identified on page 3.10-24 of the Draft EIR and is as follows:

- Result in community greenhouse gas emission levels which exceed pre-project levels by a substantial margin.
- Conflict with Assembly Bill 32 and its governing regulations.

The conclusion that the General Plan's contribution to the cumulative impacts of GHG emissions is a significant and unavoidable impact is based not on the expected reduction in GHG, but on the uncertainty, at this time, of the implementation and success of the State greenhouse gas reduction measures. In fact, the Revised Draft EIR shows that with successful

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implementation of the State measures, Petaluma emissions would be less than 2005 baseline emissions (see Table 3.10-9 copied here from the Revised Draft EIR).

Table 3.10-9 Summary of General Plan 2025 Greenhouse Gas Emissions

	Greenhouse Gas Emissions (tons CO ₂ e)
2005 Baseline Emissions	610,400
2025 General Plan Emissions	721,600
Reductions	
Selected General Plan Policies	<19,900>
State Actions Applicable to Petaluma	<139,100>
TOTAL	562,600

The question with regard to the findings for overriding considerations is not a comment on the Draft EIR. Findings of Fact and a Statement of Overriding Considerations will be prepared at the time the City is intending to adopt the General Plan.

Community greenhouse gas emissions are estimated in Table 3.10-6 of the Draft EIR. The degree that the City can exert influence over any of these emissions varies. The General Plan does not control the purchasing habits of Petaluma citizens, nor does it control where they will work. It can, however, influence land use policy, transportation systems, and development code, which it does in over 100 policies and programs in the Draft General Plan. Specific policies that reduce GHG emissions are listed in the Revised Draft EIR on pp. 3.10-29 through 31.

172 **Comment:** Commend GHG effort; sidewalk and ITS strategies

Response: Comment noted.

173 **Comment:** How much attempt was made to reach the City goals? Ideas such as banning parking in certain areas? Transportation comparison, Contra Costa is lowest, highest is Petaluma; there should be a better way to meet traffic needs through improved traffic means. Did the City look at Rainier and what it does to reduce GHG. Issue with existing Council Resolution which mandates certain goals, finding it difficult to recommend a document does not meet that goal.

Response: As different General Plan policies/programs were considered they were evaluated for inclusion as General Plan policies based on their effectiveness, feasibility, and appropriateness for implementation through the General Plan. Specific proposals, such as a LED Christmas light exchange program or an Energy Star appliance rebate program, were not included as a General Plan policy, but should be looked at and evaluated in the Municipal Climate Action Plan called for under Policy 4-P-22. Implementation of the Rainier overpass was included in the traffic model for buildout of the *Draft General Plan 2025*. Refer to Master Response C, regarding the inclusion of Resolution 2005-118 as a Goal in the General Plan.

174 **Comment:** Two issues: error in GP, 2762 I Street incorrectly shown for land use; energy costs

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have gone up for a reason: 1) dollar devaluation; and 2) cost of petroleum, all aspects of developing petroleum (examples). Conservation is absolutely essential. Leave accommodations wide open so that the individual can take the necessary steps to conserve (don't constrain business and individuals).

Response: The commenter is incorrect; the land use designation of 2762 I Street illustrates three land use designations: Rural Residential, Very Low Density Residential and Urban Separator; the same densities and/or land use shown on the 1987-2005 General Plan Land Use Map. Energy comments noted.

175 **Comment:** In addressing the State's requirements for specificity of solutions, we have opted to be specific for the GP and EIR; concern is that 20 years from now we may have been so detailed that we create something obsolete – how do we respond in the GP. Option of putting policies and programs in a separate document. Should strengthen the language for preparation of a Climate Action Plan to “shall”.

Response: Comment noted. CAP now a “shall” program.

176 **Comment:** CEQA only asks that we address existing conditions, therefore the DEIR does not have to meet the local goal. Ideas for mitigation include purchase (i.e. neighborhood) to buy solar panels through a “neighborhood buy” for group discount, excess power could multiply out to neighbors;; also question of “green-collar jobs”, encouragement of design and installation of green improvements; classes at local schools (high school and SRJC) to train people for those jobs; GHG mitigation fee. City should start work on the Climate Action Plan (change may to shall).

Response: Comment noted.

177 **Comment:** In favor of fee when mitigations aren't incorporated into design of projects; agree with 'shall' with regard to CAP; the CAP will be the key to implementation of the GP following GP adoption.

Response: Comment noted; CAP requirement amended to “shall”.

178 **Comment:** Wants less development potential, slowing development; increase transit ridership to a certain percentage and how we are going to get there; what about providing large, sweeping alternatives; we haven't been given all or some of the alternatives that we could have seen; wants to see GHG mitigation fee.

Response: Comments noted. See Master Response A regarding alternative identification, analysis, and selection. Program added to implement GHG mitigation fee as part of Climate Action Plan.

179 **Comment:** The City needs to think about how to get there: encourage telecommuting, a Mayor's bus ride, conservation methods as offered by Ned Orrett, do not allow a million square feet of retail.

Response: Comments noted. Water Conservation Plan was adopted in January 2008; Ned Orrett was on the initial water conservation planning team.

180 **Comment:** Quote from AG letter, Climate Protection Campaign, compromised to get to 25%

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reduction commitment, look at solutions proposed by Rohnert Park, community choice aggregation, Ned Orett's ideas on energy efficiency plan, look at Marin County.

Response: Refer to Master Response C with regard to the Greenhouse Gas Emissions and the reduction commitments made in Resolution 2005-118. General Policy 4-P-123 requires the preparation of a feasibility report for formation of a Community Choice Aggregation. Policy 4-P-126 requires the City to develop and implement a green building program.

181

Comment: Read submittal (see written comment #171).

Response: See response #171.

182

Comment: Requested Mayor's comments be submitted as comments on the DEIR (see comment #178 above); submitted letter (see written comment #170); Greenhouse Gas calculations needs to be in document; mixed use must be required; GHG references contained in other elements should be included in this document; local retail, local business, telecommuting.

Response: See responses #170 and #178.

183

Comment: Bike Plan is an excellent start, need to do more.

Response: Comment noted.

184

Comment: Referenced Attorney General's letter; her participation is the culmination of 14 years idealism, shared history of participation, General Plan needs mandates; three examples: 1) tighten up language, CPSP, page 8 of 27 regarding Land Use; 2) Boost effectiveness of PBAC, include a "shall" that final conditions be provided to the PBAC; 3) On the subject of schools, there are no teeth on school references.

Response: Comments noted, see response 168 A-V.

185

A - G

Comment: **A.** Economic Annex and city revenue expectations are inaccurate and invalid: (1) the annex uses an arbitrary inflation rate and discount rate; **B.** "Economic Annex" and city revenue expectations are inaccurate and invalid: (2) the base year reflected stability of growth rather than recession, and the dollar amount of deferred maintenance were not tabulated; **C.** Federal operating revenues are declining; **D.** Liquid fuel energy sources are declining, and rising costs will affect Petaluma; "the impact on US, California and Petaluma will be no different from that of a tax that is rising exponentially." **E.** Growth is tied inseparably to energy, and new technologies will not be available for many years. **F.** The economic annex does not provide a bottom up analysis of costs, does not include capital expenditures or the costs of deferred maintenance, and does not identify who should pay the various costs of running the city. **G.** In light of the tax revenue needs of the higher echelons of government and other factors, no new taxes will be possible.

Response: **A.** Not a comment on the EIR. The "Economic Annex" to which the commenter refers is taken to be the Report on the Fiscal Impacts of the Draft General Plan 2025. The fiscal report addresses changes in City operating revenues that are collected in the general fund and operating costs that are paid for by the general fund.

The portion of the comment regarding an arbitrary inflation rate and an equally arbitrary

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discount rate is not well founded. The inflation rate used in the model is based on the average annual change in the consumer price index over the past 25 years. For the base case, the discount rate is set equal to the inflation rate. This practice allows for an analysis that considers the revenue-reducing effect (in constant dollars) of revenue sources that do not increase with inflation; for example, some property taxes or (frequently) locally-imposed fees and service charges. Applying the same inflation and discount rates to all plan scenarios focuses the analysis on the effects of new development rather than on external economic conditions that are beyond the control of the city.

The fiscal analysis does explicitly test alternative rates of inflation for some revenues and costs (see pp. 22 ff of the report); in this report, specifically, for housing prices. (The fiscal analysis of plan alternatives also tested different rates of increase in funding from state and federal governments.)

B. Not a comment on the EIR. The base year revenue and cost relationships used in the fiscal analysis are defined based on the current year's budget; in this case, the City's operating budget for FY 2007-08. Because they are based on information for a single year, they do not capture any trends in revenues or expenditures.

In general, revenues collected by California cities have not risen as fast as costs since the adoption of Proposition 13 (Article XIII A of the California Constitution) and subsequent measures that restrict the ability of state and local governments to adopt new taxes and fees or increase existing taxes and fees. As a result, cities have had to reduce levels of service virtually every year in order to achieve expenditure levels that do not exceed their expected revenues. One aspect of "reduced levels of service" is typically deferred maintenance, and Petaluma is no exception to the typical case in this respect: streets, parks, city vehicles, infrastructure, and public buildings are repaired or replaced less frequently, because higher priority is placed on the provision of such ongoing services as police and fire protection.

Because the fiscal study focuses on the impacts of land use changes, it also does not address deferred maintenance; instead, it assumes that current levels of service will be held constant (personnel or costs per capita, or per street mile, or per park acre) to isolate the impacts of land use changes from other influences such as levels of service. In cases where the analysis shows a declining reserve fund, it is indicating that even more maintenance will be deferred or that levels of service will decline; where it shows an increasing reserve fund, it is indicating that some deferred maintenance will be undertaken or that levels of service could improve.

(The fiscal analysis of plan alternatives, produced in September, 2006, did test different levels of expenditure for park maintenance to consider the impact of that cost on the city's fiscal condition. The alternate level of expenditure was tested for each of the three plan alternatives so that the effects of additional costs could be distinguished from the effects of additional park lands.)

C. Not a comment on the EIR. This comment, which seems to suggest that declining federal (and state) revenues will reduce the level of funding assistance available to Petaluma from the federal (and state) government, is noted.

D. Not a comment on the EIR. The commenter seems to suggest that because energy

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expenditures will absorb ever-increasing purchasing power, fewer dollars will be available to people and the City of Petaluma to pay for public services, while, at the same time, the City's energy costs will rise. This comment is noted.

E. Not a comment on the EIR.

F. Not a comment on the EIR. The fiscal analysis is, in fact, based on a bottom-up analysis: to build the model that projects revenues and costs, staff in all departments funded by the general fund were interviewed to identify the relationships between the different land uses and demands for their services.

The fiscal analysis focuses on the general fund, which is the repository for most ongoing and recurring revenues collected by the City of Petaluma, and which pays for most of the ongoing and recurring costs of city operations. Therefore, it is inappropriate to include capital costs in the analysis: capital costs for specific new development projects are, as a rule, covered by the sponsors of those projects. Capital costs that would benefit the city as a whole may be paid in part by the new developments, but the portion of the cost that would benefit existing development/population must be generated from other citywide sources. The commenter is correct that the fiscal analysis does not consider these costs (that point is explained on page 12 of the report).

See the response to comment 2 regarding the exclusion of deferred maintenance costs from the analysis.

The commenter is correct that the fiscal analysis does not identify who should pay the various costs of running the city. That subject is a matter of policy, to be decided by the city's elected decision makers within the framework established by California law.

The fiscal analysis assumes that the costs of gas and electricity will rise more rapidly than the general inflation rate, as shown in Appendix C (Table C1) of that report:

General inflation:	3.0 percent per year
Utilities (years 1-8):	7.0 percent per year
(years 9-22):	5.0 percent per year

Because most City costs are personnel-based, this differential does not have a significant impact on the projection of costs. It does, however, affect the estimate of revenues from franchise fees, which are based on the utilities' revenues from sales of gas and electricity to Petaluma residents and businesses.

G. Not a comment on the EIR. The three levels of government – federal, state, and local – are, for the most part, functionally separate. Federal and state revenue shortfalls may reduce or eliminate the federal government's propensity to provide grants or other revenue sharing arrangements to the local governments, but they do not eliminate the local government's ability to raise taxes. It is true that the State of California has taken revenue from local governments to cover its own shortfalls (the Educational Revenue Augmentation Fund), but that take does not inhibit the ability of the people of the City of Petaluma to raise their own taxes. The major restraint on new or increased taxes in the City – as in all California jurisdictions – is the set of requirements adopted by voters through a series of initiatives that make all increases in existing revenue sources and adoption of new sources subject to a vote of

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- the electorate.
- 186** **Comment:** Referenced Flood Insurance Rate Map (FIRMs), City's National Flood Insurance Program (NFIP) participant status; referenced Volume 44 Code of Federal Regulations (44 CFR), Sections 59 through 65 regarding NFIP floodplain management building requirements.
Response: Comment noted. The City has achieved a Class 6 in the Community Rating System (CRS) of the NFIP program. The City has consistently been more restrictive than the minimum standards of Volume 44, Code of Regulations. The DEIR and General Plan augment existing policies by adding further restrictions to development within the regulatory floodplain.
- 187** **Comment:** Acknowledgement of compliance with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.
Response: Comment noted.
- NA** ✓ **Author Generated DEIR modification:** Page 3.10-32, paragraph replaced by:
"California Solar Initiative: In late 2006, the Public Utilities Commission finalized implementation rules which took effect beginning January 2007. The Initiative is designed to deliver approximately 2,000 megawatts of clean, emissions-free energy to the California grid by 2016. The City supports and encourages the development of passive solar systems through the implementation of Policies 4-P-10, 4-P-14, and 4-P-22. Adoption of the Green Building programs as called for in Policy 3-P-127 and Policy 3-P-128 also would support passive solar."

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- ^{iv} Domenico, P. and D. Schwartz, 1990, "Physical and Chemical Hydrogeology", John Wiley & Sons, Inc., New York, NY.
- ^v Hudson, G.B., H. Beller, C. Moody Bartel, S. Kane, C. Campbell, A. Grayson, N. Liu, and S. Burastero, 2005, "Environmental Transport and Fate of Endocrine Disruptors from Non-Potable Reuse of Municipal Wastewater", November 16, 2005, Lawrence Livermore National Laboratory, UCRL-TR-217159.
- ^{vi} Crites, R.W. *et al.*, 2006 "Recycling in Hawaii: A Study Looks at the Feasibility of Applying Recycled Water on Land Above Potable Water Aquifers in Hawaii", *Water Environment and Technology*: Vol. 18, No. 5, May 2006, pp 45-47.

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Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies and Programs that Reduced the Impact</i>		<i>Signifi- cance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
3.1-1	<i>The proposed General Plan may result in the conversion of some farmland to non-agricultural uses.</i>	2-P-1	Promote a range of land uses at densities and intensities to serve the community needs within the Urban Growth Boundary (UGB). A. Update the city's Development Code for consistency with the General Plan, including: <ul style="list-style-type: none"> • Establishment of new base districts, consistent with the land use classifications in the General Plan. • Continue the identification of overlay districts, such as the Floodplain and Historic Districts. • Creation of the Petaluma River Corridor. • Maintain both minimum and maximum development intensities as stipulated in the General Plan Land Use Classifications. • Opportunities for infill without land division. • Design Guidelines, where applicable. 	Less than Significant	Map 1-P-1	The General Plan Land Use Map retains 77 acres within the UGB designated as Agriculture. Promote a range of land uses at densities and intensities to serve the community needs within the Urban Growth Boundary (UGB). A. Update the city's Development Code for consistency with the General Plan, including: <ul style="list-style-type: none"> • Establishment of new base districts, consistent with the land use classifications in the General Plan. • Continue the identification of overlay districts, such as the Floodplain and Historic Districts. • Creation of the Petaluma River Corridor. • Maintain both minimum and maximum development intensities as stipulated in the General Plan Land Use Classifications. • Opportunities for infill without land division. • Design Guidelines, where applicable.
		2-P-2	Use land efficiently by promoting infill development, at equal or higher density and intensity than surrounding uses.		1-P-2	Use land efficiently by promoting infill development, at equal or higher density and intensity than surrounding uses.
		2-P-16	Maintain a permanent open space around the city by the continuation of the Urban Separator and the use of an Urban Separator Pathway, where appropriate.		1-P-16	Maintain a permanent open space around the city by the continuation of the Urban Separator and the use of an Urban Separator Pathway, where appropriate.
		2-P-23	Support designation of land uses in the unincorporated area beyond the Urban Growth Boundary as rural, agricultural and/or open space. A. Work with local, state and federal funding sources to acquire open space outside of the Urban Separator and/or beyond the Urban Growth Boundary where community-wide benefit is achieved.		1-P-23	Support designation of land uses in the unincorporated area beyond the Urban Growth Boundary as rural, agricultural and/or open space. A. Work with local, state and federal funding sources to acquire open space outside of the Urban Separator and/or beyond the Urban Growth Boundary where community-wide benefit is achieved.

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Significance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
		2-P-25	<p>It is the policy of the City to build within the agreed upon Urban Growth Boundary. No urban development shall be permitted beyond the Urban Growth Boundary. "Urban development" shall mean development requiring one or more basic municipal services including, but no limited to, water service, sewer, improved storm drainage facilities, fire hydrants and other physical public facilities and services, but shall not mean providing municipal or public services to open space uses, public or quasi-public uses such as schools or public safety facilities. Said municipal or public services or facilities can be developed beyond the UGB to provide services within the UGB.</p> <p>A. Maintain a time certain and parcel-specific Urban Growth Boundary around the city, beyond which urban development will not take place.</p> <p>B. Use the growth management system, design review, or other project review methods to assure that the density of new residential development is greatest within and adjoining existing urbanized areas and gradually and logically lessens as it approaches the urban edge.</p> <p>C. Encourage the County to continue to promote agricultural land use and to strictly limit further residential infilling on lands beyond the Urban Growth Boundary within the Petaluma Planning Referral Area.</p>		1-P-24	<p>Support regulatory measures and work with other jurisdictions and agencies to maintain and expand the existing Community Separators in agreement with Sonoma and Marin Counties.</p> <p>The Urban Growth Boundary measure, adopted in 1998, is set forth in Policies 1-P-25 through 1-P-32, verbatim.</p>
3.2-1	<i>Increased motor vehicle traffic would result in unacceptable level of service (LOS) at study</i>	5-P-1	<p>Develop an interconnected mobility system that allows travel on multiple routes by multiple modes.</p> <p>A. Develop a network that categorizes streets according to function and type, considering the surrounding land use context.</p> <p>B. Develop a network for off-street paths and</p>	Significant and Unavoidable	5-P-1	<p>Develop an interconnected mobility system that allows travel on multiple routes by multiple modes.</p> <p>A. Develop a network that categorizes streets according to function and type, considering the surrounding land use context.</p> <p>B. Develop a network for off-street paths and routes</p>

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>	<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Significance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
<i>intersections.</i>		<p>routes according to function and type, considering the intensity of use and purpose.</p> <p>C. Review and update the City's Street Design Standards to be consistent with street function and typology, using Figure 5-2 as a guide.</p> <p>D. Explore the redesign of designated main and mixed use streets to potentially reduce the width and/or number of travel lanes, improve the multimodal function of intersections, and introduce amenities such as wider sidewalks, special paving treatments, bus priority treatments, landscaped medians, and street trees within parking lanes.</p> <p>E. Evaluate the feasibility of road diets on streets with projected excess capacity at buildout.</p>			<p>according to function and type, considering the intensity of use and purpose.</p> <p>C. Review and update the City's Street Design Standards to be consistent with street function and typology, using Figure 5-2 as a guide.</p> <p>D. Explore the redesign of designated main and mixed use streets to potentially reduce the width and/or number of travel lanes, improve the multimodal function of intersections, and introduce amenities such as wider sidewalks, special paving treatments, bus priority treatments, landscaped medians, and street trees within parking lanes.</p> <p>E. Evaluate the feasibility of road diets on streets with projected excess capacity at buildout</p>
	5-P-2	<p>Ensure the identified mobility system is provided in a timely manner to meet the needs of the community.</p> <p>A. Ensure new developments pay a fair share of mobility improvements and that those improvements are undertaken in context with that development.</p> <p>B. Review City transportation impact fees to insure that necessary citywide improvements are funded.</p> <p>C. Allocation of mitigation funds shall be designated to the specific capital improvement project for which it was exacted.</p>		5-P-2	<p>Ensure the identified mobility system is provided in a timely manner to meet the needs of the community by updating the City's transportation impact fee program to insure that necessary citywide improvements are funded.</p> <p>A. Transportation impact fees will be determined based on each project's fair share of the aggregate costs of roadway improvements identified within the Mobility Element and EIR.</p> <p>B. The fee program is intended to ensure that new developments pay its proportionate share of traffic infrastructure improvements to mitigate direct traffic impacts from new development.</p> <p>C. Some portion(s) of the identified mobility system improvements will be constructed as part of project related frontage improvements.</p> <p>D. Allocation of mitigation funds shall be designated to the capital improvement project for which it was exacted.</p>

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Significance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
		5-P-3	<p>Ensure public improvements are constructed and maintained in a manner that is economically feasible to the budgetary constraints of the City.</p> <p>A. Establish priorities for transportation improvements and prepare an action program to implement identified street improvements.</p> <p>B. Investigate innovative means to fund the design, construction, and maintenance of both neighborhood and community-wide mobility infrastructure.</p>		5-P-3	<p>Ensure public improvements are constructed and maintained in a manner that is economically feasible to the budgetary constraints of the City.</p> <p>A. Establish priorities for transportation improvements and prepare an action program to implement identified street improvements.</p> <p>B. Investigate innovative means to fund the design, construction, and maintenance of both neighborhood and community-wide mobility infrastructure.</p>
		5-P-4	<p>New development and/or major expansion of change of use may require construction of off-site mobility improvements to complete appropriate links in the network necessary for connecting new with existing neighborhoods and land uses.</p>		5-P-4	<p>New development and/or major expansion of change of use may require construction of off-site mobility improvements to complete appropriate links in the network necessary for connecting new with existing neighborhoods and land uses.</p>
		5-P-5	<p>Consider impacts on overall mobility and travel by multiple travel modes when evaluating transportation impacts.</p>		5-P-5	<p>Consider impacts on overall mobility and travel by multiple travel modes when evaluating transportation impacts.</p>
		5-P-8	<p>The priority of mobility is focused on the movement of people within the community including the preservation of quality of life and community character.</p> <p>A. Develop formal transportation impact analysis guidelines that consider multi-modal impacts of new developments.</p> <p>B. Develop and adopt multi-modal level of service (LOS) standards that examine all modes and vary the standards by facility type to imply a preference to selected modes based upon the context (including street type and location).</p> <p>C. LOS analysis data shall utilize the peak period rather than the peak hour for determining intersection LOS.</p>		5-P-8	<p>The priority of mobility is focused on the movement of people within the community including the preservation of quality of life and community character.</p> <p>A. Develop formal transportation impact analysis guidelines that consider multi-modal impacts of new developments.</p> <p>B. Develop and adopt multi-modal level of service (LOS) standards that examine all modes and vary the standards by facility type to imply a preference to selected modes based upon the context (including street type and location).</p> <p>C. LOS analysis data shall utilize the peak period rather than the peak hour for determining intersection LOS.</p>
		5-P-10	<p>Maintain a level of service (LOS) standard for motor vehicle circulation that ensures efficient traffic flow</p>		5-P-	<p>Policy 5-P-10: Maintain an intersection level of service (LOS) standard for motor vehicle circulation that ensures efficient traffic</p>

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			and supports multi-modal mobility goals. LOS should be maintained at Level D or better for motor vehicles due to traffic from any development project.	10	<p>flow and supports multi-modal mobility goals. LOS should be maintained at Level D or better due to traffic from any development</p> <p>A. A lower Level of Service may be deemed acceptable, by the City, in instances where the City finds that potential vehicular traffic mitigations (such as adding additional lanes or modifying signal timing) would conflict with the Guiding Principles of the General Plan, particularly with regard to:</p> <ul style="list-style-type: none"> ▪ Guiding Principal #2. Preserve and enhance Petaluma's historic character. ▪ Guiding Principal #6. Provide a range of attractive and viable transportation alternatives, such as bicycle, pedestrian, rail and transit. ▪ Guiding Principal #7. Enhance Downtown by preserving its historic character, increasing accessibility, and ensuring a broad range of business and activities and increasing residential activities. <p>The above does not relieve any need to mitigate development related impacts, which may include multi-modal improvements to reduce identified impacts.</p>
		5-P-11	<p>Require proposed development to assist, in addition to seeking other funding sources, in the funding and construction of the following improvements:</p> <ul style="list-style-type: none"> • Washington Street/Highway 101 interchange improvements • Rainier Avenue extension and interchange • Caulfield Lane extension to Petaluma Boulevard South (southern crossing) • Old Redwood Highway interchange widening • Copeland Street extension to Petaluma Boulevard North 	5-P-11	<p>Require proposed development to assist, in addition to seeking other funding sources, in the funding and construction of the following improvements:</p> <ul style="list-style-type: none"> • Washington Street/Highway 101 interchange improvements • Rainier Avenue extension and interchange • Caulfield Lane extension to Petaluma Boulevard South (southern crossing) • Old Redwood Highway interchange widening • Copeland Street extension to Petaluma Boulevard North • Caulfield Lane/Payran Street Intersection Improvements

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	<ul style="list-style-type: none"> • Caulfield Lane/Payran Street Intersection Improvements • Petaluma Boulevard/Magnolia Avenue Payran Street Intersection. 		<ul style="list-style-type: none"> • Petaluma Boulevard North/Magnolia Avenue Payran/Street Intersection.
	<p>5-P-13 Encourage existing major employers to develop and implement Transportation Demand Management programs to reduce peak-period trip generation.</p> <p>A. Study the feasibility of a citywide TDM program that would be funded by annual fees or assessments on new development.</p> <p>B. Assign a proportion of TDM fees to Petaluma Transit for expansion of service and future fare reductions or fare elimination.</p> <p>C. As part of the development code, require TDM measures for all new non-residential development.</p> <p>D. Assign trip reduction credits and reduced transportation impact fees for demonstrated commitment to TDM strategies.</p> <p>E. Reduce parking requirements for mixed-use developments and for developments providing shared parking or a TDM program.</p> <p>F. Establish a TDM program for City of Petaluma employees.</p> <p>G. Collaborate with Santa Rosa Junior College to minimize the impact of future enrollment growth on local traffic and parking demand, such as through TDM measures, limitations on parking near the College and on-campus parking management.</p>	5-P-13	<p>5-P-13 Encourage existing major employers to develop and implement Transportation Demand Management programs to reduce peak-period trip generation.</p> <p>A. Study the feasibility of a citywide TDM program that would be funded by annual fees or assessments on new development.</p> <p>B. If developed, assign a proportion of TDM fees to Petaluma Transit for expansion of service and future fare reductions or fare elimination.</p> <p>C. Assign trip reduction credits and reduced transportation impact fees for demonstrated commitment to TDM strategies.</p> <p>D. Reduce parking requirements for mixed-use developments and for developments providing shared parking or a TDM program.</p> <p>E. Consider establishing a TDM program for City of Petaluma employees.</p> <p>F. Continue to collaborate with Santa Rosa Junior College to minimize the impact of future enrollment growth on local traffic and parking demand, such as through TDM measures, limitations on parking near the College and on-campus parking management.</p> <p>G. Encourage provision of preferential parking in selected areas for designate carpools, motorcycles, bikes and alternative fuel vehicles.</p> <p>NOTE: While adoption of the Trip Reduction Ordinance is identified as a potential mitigation to help decrease levels of traffic, through voluntary participation, the Ordinance itself is not relied on to mitigate the conditions to "less than significant" levels at any of the falling intersections, since those</p>

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						intersections have been identified as having significant and unavoidable impacts.
3.2-2	<i>Implementation of the proposed General Plan could cause increased demand for transit service.</i>	5-P-40	Expand the bus transit system so that it is convenient and provides frequent, regular service along major City corridors serving shopping and employment destinations. A. Identify increased funding sources for local transit service and improvements.	Less than Significant	5-P-40	Expand the bus transit system so that it is convenient and provides frequent, regular service along major City corridors serving education, shopping and employment destinations. A. Identify increased funding sources for local transit service and improvements.
		5-P-41	Support efforts for transit oriented development around the Petaluma Depot and along the Washington Street and Petaluma Boulevard transit corridors. A. Reserve and plan for future bus stop enhancement and transit priority along Washington Street and Petaluma Boulevard.		5-P-41	Support efforts for transit oriented development around the Petaluma Depot and along the Washington Street, Petaluma Boulevard, McDowell Boulevard, Lakeville Street and other transit corridors. A. Reserve and plan for future bus stop enhancement and transit priority along Washington Street and Petaluma Boulevard. B. Enhance the use of the Park and Ride facility at the Fairgrounds through education and marketing.
		5-P-42	Maintain a transit system of nominal cost to riders. A. Investigate the creation of subsidies for designations such as education, significant employment, and/or recreation destinations. B. Collaborate with Santa Rosa Junior College to promote measures to enhance transit access and service at the Petaluma Campus.		5-P-42	Maintain a transit system of nominal cost, or no cost, to riders. A. Investigate the creation of subsidies for designations such as education, significant employment, and/or recreation destinations. B. Collaborate with Santa Rosa Junior College to promote measures to enhance transit access and service at the Petaluma Campus.
		5-P-43	Coordinate transit improvement efforts between Petaluma Transit, Sonoma County Transit, Golden Gate Transit, and SMART.		5-P-43	Coordinate transit improvement efforts and schedules among Petaluma Transit, Sonoma County Transit, Golden Gate Transit, paratransit, commuter rail, and schools.
		5-P-44	Consider benefits to the possible consolidation of transit serving agencies.		5-P-44	Consider benefits to the possible consolidation of transit serving agencies.
3.2-3	<i>Provision of secure and safe bicycle parking</i>	5-P-31	Make bicycling and walking more desirable by providing or requiring development to provide necessary support facilities throughout the city.	Less than Signifi	5-P-31	Make bicycling and walking more desirable by providing or requiring development to provide necessary support facilities

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	<i>may be inadequate.</i>		A. Provide secure, protected parking facilities and support services for bicycles at locations with high bicycle-parking demands such as multi-family housing and shopping and employment centers.	cant		throughout the city. A. Provide secure, protected parking facilities and support services for bicycles at locations with high bicycle-parking demands such as multi-family housing and shopping and employment centers. B. Install drinking fountains serving people and their pets in strategic locations to make it easier and healthier for pedestrians and bicyclists to be outdoors and travel long distances. C. Provide easily accessible and aesthetically pleasing public restrooms wherever feasible. D. Require projects subject to discretionary approval to install public benches where appropriate. E. Install non-glare lighting along multi-use paths that serve as commuter routes.
3.2-4	<i>Implementation of the proposed General Plan could result in increased demand for motor vehicle parking.</i>	5-P-14	To the extent deemed feasible and appropriate by the City, maximize shared parking opportunities and support the construction of additional structured parking in Central Petaluma.	Less than Significant	5-P-14	To the extent deemed feasible and appropriate by the City, maximize shared parking opportunities and support the construction of additional structured parking in Central Petaluma.
3.3-1	<i>Future development may result in a decrease of parkland per 1,000 residents.</i>	6-P-1	Develop additional parkland in the city, particularly in areas lacking these facilities and where new growth is proposed, to meet the standards of required park acreage. A. Develop and implement a Parks Master Plan. B. Work with local, regional, and state agencies to acquire and fund further park-land acquisition and improvements. C. Undertake a proactive program to acquire necessary land and develop new parks in the locations shown in Figure 6-1, prioritizing areas where new development may occur and park opportunities may be lost, and in underserved	Less than Significant	6-P-1	Develop additional parkland and recreational facilities in the city, particularly in areas lacking these facilities and where new growth is proposed, to meet the standards of required park acreage. A. Develop and implement a Parks Master Plan, including the reevaluation of existing resources to determine best uses for the benefit of the community (e.g. Lucchesi Park Pond). B. Through the Parks Master Plan process and the park design process, determine the make-up of any given park (e.g. passive/active and the level and type of park features). <ul style="list-style-type: none">Active Parks: emphasis on athletic fields, aquatics,

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	<p>neighborhoods.</p> <p>D. As part of the City's Development regulations establish common open space requirements for multi-family development. Such open space shall NOT to be counted toward public park dedication/in lieu fee requirements.</p> <p>E. Require land development along designated trails and pathway corridors to provide sufficient right-of-way and to ensure that adjacent new development does not detract from the scenic and aesthetic qualities of the corridor.</p> <p>F. Encourage and support the use of public land for community gardens.</p>		<p>courts, etc.</p> <ul style="list-style-type: none"> • Passive Parks: emphasis on pathway, tot lots, informal playfields, etc. • The provision of amenities (e.g. restrooms) based on intensity of use. <p>C. Work with local, regional, and state agencies to acquire and fund further parkland acquisition and improvements.</p> <p>D. Undertake a proactive program to acquire necessary land and develop new parks in the locations shown in Figure 6-1, prioritizing areas where new development may occur and park opportunities may be lost, and in underserved neighborhoods.</p> <p>E. As part of the City's Development regulations establish common open space requirements for multi-family development. Such open space shall NOT to be counted toward public park dedication/in lieu fee requirements for meeting neighborhood and/or community park needs.</p> <p>F. Require land development along designated trails and pathway corridors to provide sufficient right-of-way for trails and amenities and to ensure that adjacent new development does not detract from the scenic and aesthetic qualities of the corridor.</p> <p>G. Encourage and support the collaboration of local school districts, non-profit organizations and private parties in the use of public lands for outdoor education opportunities such as: community gardens, riparian or wetland enhancement projects, wildlife study/protection areas, etc.</p> <p>H. Improve community health and unity by providing community-wide, family-oriented special events that bring the community together (e.g. Movies in the Park, family festivals, etc.).</p> <p>I. Where feasible, acquire and/or restore, maintain and use for the community's benefit, local historic assets (e.g. Steamer Landing Livery Stable, McNear Channel, Polly</p>

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					<p>Hannah Klaas Performing Arts Center, etc.).</p> <p>J. Work collaboratively with affected property owners to dredge the McNear Channel and utilize this protected body of water for small boating in concert with local organizations, including the development of a small boating facility that can house instructional and/or historical programs relating to the Petaluma River and Petaluma's historical heritage.</p> <p>K. Explore opportunities for the development of a public multi-use, small-craft center providing a venue for recreational and competitive small boaters (e.g. rowing shells, outrigger canoes, kayaks, traditional wooden boats, and other human and sail powered watercraft) on the Petaluma River.</p>
		6-P-2	<p>Provide a comprehensive and integrated network of parks and open space and improve access to existing facilities where feasible.</p> <p>A. Provide public access and recreational opportunities along the length of the Petaluma River and its tributaries, to every extent possible.</p>		6-P-2 <p>Provide a comprehensive and integrated network of parks and open space and improve access to existing facilities where feasible.</p> <p>A. Provide public access and recreational opportunities along the length of the Petaluma River and its tributaries, to every extent possible.</p> <p>B. Identify missing links to connect parks and open spaces with neighborhoods and community destinations. Develop prioritization and funding to complete these links.</p>
					6-P-3 <p>Connect city parks with other public facilities, open spaces, employment centers, and residential neighborhoods by locating new recreation facilities in proximity to these uses and by fully integrating the parks system with the city's pedestrian, bicycle, and transit systems.</p>
		6-P-3	<p>Proposed parks, and proposed expansion of existing parks, as designated on the General Plan Land Use Map, are parcel specific, and shall be dedicated as a condition of development entitlements.</p>		6-P-4 <p>Proposed parks, and proposed expansion of existing parks, as designated on the General Plan Land Use Map, are parcel specific, and shall be dedicated as a condition of development entitlements, consistent with federal, state and local law. Dedication requirements for development subject to the Quimby Act (Government Code Sec. 66477) shall be consistent with the</p>

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			requirements of that Act.
			6-P-5 New parkland or recreation facilities, beyond those identified in the General Plan, may be required as part of any development review and entitlement process.
	6-P-5 Maintain a park standard of 5 acres per 1,000 residents, in order to enhance the physical environment of the city and to meet the recreation needs of the community A. Revise the City's park in lieu fees/dedication requirements to match the General Plan standard of 5 acres per 1,000 residents.		6-P-6 Achieve and maintain a park standard of 5 acres per 1,000 residents (community park land at 3 acres per 1,000 population and neighborhood park land at 2 acres per 1,000 population) and an open space/urban separator standard of 10 acres per 1,000 population, in order to enhance the physical environment of the city and to meet the recreation needs of the community. A. Revise the City's park in lieu fees/dedication requirements to match the General Plan standard of 5 acres per 1,000 residents (community park land at 3 acres per 1,000 population and neighborhood park land at 2 acres per 1,000 population).
	6-P-6 Neighborhood parks are donated, constructed, and maintained within the developing property(ies). In addition to the donation and improvements, park impact fees shall be paid to offset costs associated with developing, upgrading, and maintaining community parks. Transfer of density from the donated park acreage may be considered where deemed appropriated by the City Council. A. Revise the City's Municipal Code to require dedication of neighborhood park land, and construction of associated neighborhood park improvements, in addition to the payment of park impact fees, eliminating the reimbursement component for neighborhood parks. B. Establish a transfer of development rights (TDR) program that allows project proponents on whose sites new parkland locations are designated, to transfer development rights from portions of the site dedicated as public open		6-P-7 Neighborhood parks are donated, constructed, and maintained within the developing property(ies). The formation of landscape assessment districts to offset costs associated with developing, upgrading, and maintaining community parks may be imposed as a condition of development. Transfer of density within a project site from donated acreage in excess of dedication/in lieu requirements may be considered where deemed appropriate by the City Council. Park impact fees shall also be required prior to issuance of building permits in all cases where they can be legally imposed pursuant to City ordinance. A. Review and, if necessary, revise the City's Municipal Code regarding the payment of community park impact fees to maximize all opportunities for funding community and neighborhood parkland, park improvements and park operation and maintenance through the development entitlement process. B. Establish a transfer of development rights (TDR) program that allows project proponents on whose sites new

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			<p>space/park beyond required dedication/in lieu requirements (5 acres per 1,000 residents) to the remainder of the site at a ratio of 1.5 x base land use designation on the site, subject to approval by the City Council and provided the following criteria are met:</p> <ul style="list-style-type: none"> • The resulting park area meets the minimum size and location requirements shown in Table 6.1-8 and Figure 6-1; • The park/open space is useful for recreational use, and not just leftover acreage; • The park/open space is physically and perceptually available to the community-at-large, and not internal to the development; • The resulting transfer will not unduly impact the character of the neighborhood where the development is located; and • The park/open space is not at the city's edge, adjacent to an urban separator. 			<p>neighborhood parkland locations are designated, to transfer development rights from portions of the site dedicated as public open space/park beyond required dedication/in lieu requirements (2 acres of neighborhood park per 1,000 residents) to the remainder of the site at the base land use designation on the site, subject to approval by the City Council and provided the following criteria are met:</p> <ul style="list-style-type: none"> • The resulting park area meets the minimum size and location requirements shown in Table 6.1-8 and Figure 6-1; • The park/open space is useful for recreational use, and not just leftover acreage; • The park/open space is physically and perceptually available to the community-at-large, and not internal to the development; • The resulting transfer will not unduly impact the character of the neighborhood where the development is located; and • The park/open space is not at the city's edge, adjacent to an urban separator.
					6-P-9	<p>Recognizing that schools are community assets, continue to actively promote and coordinate joint use of school properties as neighborhood parks and recreation program sites to help meet the community's demand for additional recreational facilities while realizing the cost benefits from the shared use of publicly-owned land.</p> <p>A. Create a program for shared renovation and maintenance of all recreational facilities (city and school district lands) through a possible city-wide assessment which will be in addition to current funding provided for renovation and maintenance of those facilities by the responsible agency or authority.</p>
		6-P-9	Continue to coordinate joint use of school properties		6-P-	Continue cooperating, and pursue expansion, with the local

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			as neighborhood parks and recreation program sites with school districts, which will help meet the community's demand for additional recreational facilities while realizing the cost benefits from the shared use of publicly-owned land.	10	school districts to allow public use of school open space, playfields and facilities to achieve a ratio of 1 acre per 1,000 residents, to augment the City owned recreational facilities.
		6-P-12	Maintain the existing Petaluma Swim Center and Skate Park until new, comparable sites are identified, acquired and construction funding secured for these uses.	6-P-13	<p>Recognize, maintain, and improve aquatics programs as a key element of Petaluma's Parks and Recreation Services.</p> <p>A. If the existing Petaluma Swim Center should be slated for replacement, retain the existing facility until a new, comparable site is identified, acquired, funding secured, and construction completed.</p> <p>B. Maintain and improve the current level of aquatics programming in Petaluma by operating Petaluma swim facilities with a season extending from March 1 to October 30, and with the goal of year-round operation. • A. A. B. Use an enhanced program mix based on consumer preference, and with continuing efforts to increase patronage at the Swim Center through marketing, advertising and by promoting website access.</p> <p>C. Produce an Aquatic Plan to ensure that a full range of aquatic programs are provided in Petaluma.</p> <ul style="list-style-type: none"> • The Aquatic Plan shall analyze the projected population and demographic changes in Petaluma and the anticipated impact of those changes on the future demand for aquatic facilities and programs. • The Aquatic Plan shall evaluate the current capacity of Petaluma's aquatic facilities, taking into consideration the impact of proposed development adjacent to the Petaluma Swim Center site and beyond, and project the viability of those facilities to meet the projected demand. The Aquatic Plan shall also recognize that the Petaluma pool is a unique recreational facility in the North Bay and should be considered in terms of potential programming and economic sustainability.

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					<ul style="list-style-type: none"> Based on that evaluation, the Aquatic Plan shall identify improvements, enhancements or replacement of existing facilities, including considerations of disabled access in selecting the location, design and capacity of new facilities. The Aquatic Plan shall address the potential for leveraging resources from the Petaluma School District, local services agencies, Santa Rosa Junior College District, local employers and other governmental entities to address the project demand. The Aquatic Plan shall propose the method and strategy for financing the changes necessary to meet the projected programming demand, with separate provisions for capital replacement, routine capital financing and annual maintenance costs.
		6-P-13	Work with the Sonoma County Regional Parks Department to encourage the development of Tolay Lake and Lafferty Ranch as an open space and passive use assets for the residents of Petaluma and southern Sonoma County.		6-P-14 Work with the Sonoma County Regional Parks Department and the Sonoma County Board of Supervisors to encourage the development of Tolay Lake as an open space asset for the residents of Petaluma and southern Sonoma County, and to provide regional active parks (athletic fields) in close proximity to Petaluma.
		6-P-14	Work with the Sonoma County Regional Park Department, the Sonoma County Open Space Authority, the Sonoma County Agricultural Preservation and Open Space District, the Sonoma County Water Agency, the Sonoma Land Trust, the Sonoma County Watershed Council, the California State Parks Department, and the California State Coastal Conservancy to develop common goals for open space beyond the Urban Growth Boundary, and coordinate acquisition efforts and priorities.		6-P-15 Work with the Sonoma County Regional Park Department, the Sonoma County Open Space Authority, the Sonoma County Agricultural Preservation and Open Space District, the Sonoma County Water Agency, the Sonoma Land Trust, the Sonoma County Watershed Council, the California State Parks Department, and the California State Coastal Conservancy and other entities to develop common goals for open space beyond the Urban Growth Boundary, and coordinate acquisition efforts and priorities. A. Continue to maintain Lafferty Ranch as City-owned open space for possible future passive public use.
		6-P-15	Should expansion beyond the 1998 Urban Growth Boundary occur, priority shall be given to		6-P-16 Should expansion beyond the 1998 Urban Growth Boundary occur, priority shall be given to identification and development of

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			identification and development of adequate park lands to meet identified standards and community needs.			adequate park lands to meet identified standards and community needs.
		6-P-16	<p>The City shall work with citizens, businesses, schools, organizations, and public agencies to fund an acceptable level of maintenance for all city-owned park and recreational facilities.</p> <p>A. Create opportunities and incentives, such as public acknowledgements plaques and signs, for other agencies, non-profits, private businesses, and user groups to participate in the provision, development and maintenance of parks, open space, and recreation facilities.</p> <p>B. Establish a program to work with adjacent neighborhoods to take responsibility for their neighborhood parks and urban separators, including the possibility of assuming maintenance needs or costs. Neighborhood parks 'adopted' by the residents shall remain publicly owned and accessible by the community.</p>		6-P-17	<p>Recognizing that the maintenance of City assets is a matter of civic pride, priority and safety, the City shall work with citizens, businesses, schools, organizations, and public agencies to fund an acceptable level of maintenance for all city-owned park and recreational facilities.</p> <p>A. Create opportunities and incentives, such as public acknowledgements plaques and signs, for other agencies, non-profits, private businesses, and user groups to participate in the provision, development and maintenance of parks, open space, and recreation facilities.</p> <p>B. Establish a program to work with adjacent neighborhoods to take responsibility for their neighborhood parks and urban separators, including the possibility of assuming maintenance needs or costs. Neighborhood parks 'adopted' by the residents shall remain publicly owned and accessible by the community.</p>
		6-P-17	Development that occurs adjacent to designated trails and pathway corridors shall be required to install and maintain the publicly owned and accessible trail, in perpetuity.		6-P-18	Development that occurs adjacent to designated trails and pathway corridors shall be required to install and maintain the publicly owned and accessible trail, in perpetuity.
3.4-1	<i>New development may generate additional elementary and secondary school enrollment within all the school districts serving Petaluma.</i>	7-P-12	<p>Work with school districts to ensure availability of appropriate sites for all schools needs and to identify alternative short or long term uses for school facilities and sites that may not be needed because of decreased enrollment.</p> <p>A. Work with the Petaluma school districts to undertake a comprehensive, long-range (10 – 20 years) assessment of enrollment, school sites, and capacities.</p>	Less than Significant	7-P-12	<p>Work with school districts to ensure availability of appropriate sites for all schools needs and to identify alternative short or long term uses for school facilities and sites that may not be needed because of decreased enrollment.</p> <p>A. Work with the Petaluma school districts to undertake a comprehensive, long-range (10 – 20 years) assessment of enrollment, school sites, and capacities.</p>

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					7-P-16	Should expansion of the UGB occur a priority shall be given to analyzing whether new school sites are needed; and if needed, land for future school sites shall be set aside or designated for future school development.
3.4-2	<i>New development under the proposed General Plan requires police and fire protection that exceeds current staffing and facilities.</i>	7-P-17	Achieve and maintain a minimum ratio of one fire suppression personnel per 1,000 population served. A. Fund additional staff to insure minimum ratio is maintained as population increases occur.	Less than Significant	7-P-17	Achieve and maintain a minimum ratio of one fire suppression personnel per 1,000 population served or a similar level of response service to meet increased call volumes. A. Fund additional staff to insure minimum ratio is maintained as population increases occur.
		7-P-18	Ensure facilities, equipment and personnel are adequate to maintain quality of service demands of the community, including but not limited to: fire suppression, Advanced Life Support (ALS), rescue, fire prevention, education, CUPA, and disaster preparedness and management. A. Expand Fire staffing to provide a Training Officer and Emergency Medical Services (EMS) Manager to insure maintaining compliance to Federal and State safety mandates. B. Continue education and training programs to maintain technical proficiency. C. Maintain and modernize emergency response facilities, including fire stations, as needed to accommodate population growth. D. Expand, as needed, staffing in the Fire Prevention Bureau to keep pace with increasing development and fire safety inspection impacts. E. Maintain safety department responsiveness to changes in community demographics (i.e. age, ethnicity). F. Retain a current computed-based records management system to allow monitoring and		7-P-18	Ensure facilities, equipment and personnel are adequate to maintain quality of service demands of the community, including but not limited to: fire suppression, Advanced Life Support (ALS), rescue, fire prevention, education, CUPA, and disaster preparedness and management. A. Expand Fire staffing to provide a Training Officer to insure maintaining compliance to Federal and State safety mandates. B. Continue education and training programs to maintain technical proficiency. C. Maintain and modernize emergency response facilities, including fire stations, as needed to accommodate population growth. D. Expand, as needed, staffing in the Fire Prevention Bureau to keep pace with increasing development and fire safety inspection impacts. E. Maintain safety department responsiveness to changes in community demographics (i.e. age, ethnicity). F. Retain a current computed-based records management system to allow monitoring and evaluation of program performance. G. Continue to upgrade means of communication between

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			evaluation of program performance.			<p>emergency response personnel and emergency service facilities.</p> <p>H. Continue to upgrade communication systems to maintain responsiveness to wireless calls for service.</p> <p>I. Encourage communication compatibility between local and regional systems.</p>
		7-P-19	<p>Maintain a four minute travel time for a total of 6-minute response time for emergencies within the City.</p> <p>A. Require that properties outside of the four-minute (travel) response radii utilize fire-resistant materials and maintain fire breaks surrounding residences.</p> <p>B. Ensure that transportation improvements are provided for additional development so as not to adversely impact emergency response times.</p>		7-P-19	<p>Maintain a four minute travel time for a total of 6-minute response time for emergencies within the City.</p> <p>A. Require that properties outside of the four-minute (travel) response radii utilize fire-resistant materials and maintain fire breaks surrounding residences.</p> <p>B. Ensure that transportation improvements are provided for additional development so as not to adversely impact emergency response times.</p>
		7-P-21	<p>Maintain and expand the Ambulance Enterprise System to meet continued needs in the District.</p> <p>A. Provide a third ALS ambulance within the Petaluma Fire Department.</p> <p>B. Establish and implement an ambulance replacement program.</p> <p>C. Maintain current EMS training to meet industry standards.</p>		7-P-21	<p>Maintain and expand the Ambulance Enterprise System to meet continued needs in the District.</p> <p>A. Provide a third ALS ambulance within the Petaluma Fire Department.</p> <p>B. Establish and implement an ambulance replacement program.</p> <p>C. Maintain current EMS training to meet industry standards.</p>
		7-P-25	<p>Reduce the potential for a catastrophic fire event in the historic Downtown area.</p> <p>A. Complete the fire sprinkler retrofit installation within the historic Downtown business area.</p> <p>B. Maintain and update the business fire safety inspections and pre-incident planning documents (Pre-Plans).</p>		7-P-25	<p>Reduce the potential for a catastrophic fire event in the historic Downtown and other areas.</p> <p>A. Complete the fire sprinkler retrofit installation within the historic Downtown business area.</p> <p>B. Maintain and update the business fire safety inspections and pre-incident planning documents (Pre-Plans).</p> <p>C. Explore requirements and opportunities for direct-link fire alarms.</p>
		7-P-31	Maintain a minimum standard of 1.4 police officers		7-P-	Maintain a minimum standard of 1.3 police officers per 1,000 population or a similar level of coverage to meet increased

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			per 1,000 population. A. Consider funding additional staff to ensure the minimum ratio is maintained as the population increases.		31	service calls.. A. Provide additional staff to ensure the minimum ratio is maintained as the population increases.
		7-P-32	Develop and use the City's Computer Aided Dispatch System (CAD) and Records Management System (RMS) for analysis of issues, crime trends and response times.		7-P-32	Develop and use the City's Computer Aided Dispatch System (CAD) and Records Management System (RMS) for analysis of issues, crime trends and response times.
		7-P-33	Pursue a long-term strategy for funding education and crime prevention programs recognizing that the costs of education and prevention are more effective in reducing crime than the costs of apprehending, prosecuting and incarcerating criminals.		7-P-33	Pursue a long-term strategy for funding education and crime prevention programs recognizing that the costs of education and prevention are more effective in reducing crime than the costs of apprehending, prosecuting and incarcerating criminals.
		7-P-34	Plan for expanding or replacing the police station with a facility of sufficient size to accommodate police operations, community requirements and the anticipated population growth.		7-P-34	Plan for expanding or replacing the police station with a facility of sufficient size to accommodate police operations, community requirements and the anticipated population growth. Funding of expanded facilities should be addressed through the implementation of adequate Public Facilities fees as identified in the Implementation Plan.
		7-P-35	Incorporate into new development, to the extent deemed appropriate and feasible, the Development Code Urban Design Standards for crime prevention.		7-P-35	Incorporate into new development, to the extent deemed appropriate and feasible, the Development Code Urban Design Standards for crime prevention.
		7-P-36	Ensure adequate police staff to provide rapid and timely response to all emergencies and maintain the capability to have minimum average response times. Actions that could be taken to ensure rapid and timely response to all emergencies include: A. Analyze and monitor factors affecting response time (population growth, police staffing, and community policing programs) and average response times as guide-lines based on past experience. B. Maintain, train, and equip special response teams for extraordinary or extremely hazardous emergency incidents.		7-P-36	Ensure adequate police staff to provide rapid and timely response to all emergencies and maintain the capability to have minimum average response times. Actions that could be taken to ensure rapid and timely response to all emergencies include: A. Analyze and monitor factors affecting response time (population growth, police staffing, and community policing programs) and average response times as guide-lines based on past experience. B. Maintain, train, and equip special response teams for extraordinary or extremely hazardous emergency incidents.

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3.4-3	<i>New development under the proposed General Plan requires emergency preparedness that may exceed the capabilities of the existing programs.</i>	7-P-22	<p>Ensure emergency response equipment and personnel training are adequate to follow the procedures contained within the Emergency Operations Plan for a major event, through maintaining and updating, as appropriate, the City's emergency preparedness programs, plans, and procedures to ensure the health and safety of the community in the event of an earthquake or other disaster.</p> <p>A. Review and update City department Disaster Operation Guides (DOGs) as needed.</p> <p>B. Provide training to all City personnel to remain current with all State and Federal mandated training for disaster preparedness (i.e. NIMS).</p> <p>C. Conduct training exercises for city personnel to simulate man-made or natural disasters.</p> <p>D. Consider the need, and fiscal feasibility, of providing a dedicated Disaster Coordinator.</p> <p>E. The Fire Department should provide the training and organization for community based volunteers who can provide localized assistance within their neighborhoods during an emergency.</p>	Less than Significant	7-P-22	<p>Ensure emergency response equipment and personnel training are adequate to follow the procedures contained within the Emergency Operations Plan for a major event, through maintaining and updating, as appropriate, the City's emergency preparedness programs, plans, and procedures to ensure the health and safety of the community in the event of an earthquake or other disaster.</p> <p>A. Review and update City department Disaster Operation Guides (DOGs) as needed.</p> <p>B. Provide training to all City personnel to remain current with all State and Federal mandated training for disaster preparedness (i.e. NIMS).</p> <p>C. Conduct training exercises for city personnel to simulate man-made or natural disasters.</p> <p>D. Consider the need, and fiscal feasibility, of providing a dedicated Disaster Coordinator.</p> <p>E. The Fire Department should provide the training and organization for community based volunteers who can provide localized assistance within their neighborhoods during an emergency.</p>
		7-P-23	<p>Continue to utilize the Emergency Operations Center (EOC) to provide early warning of and response to all life-threatening hazards, such as earthquakes, floods, landslides, severe storms, and hazardous materials incidents.</p> <p>A. Evaluate the effectiveness of the EOC facility and consider relocation to other city facilities to improve emergency operations and coordination.</p>		7-P-23	<p>Continue to utilize the Emergency Operations Center (EOC) to provide early warning of and response to all life-threatening hazards, such as earthquakes, floods, landslides, severe storms, and hazardous materials incidents.</p> <p>A. Evaluate the effectiveness of the EOC facility and consider relocation to other city facilities to improve emergency operations and coordination.</p> <p>B. Support the establishment of, and publicize a low power FM radio station with links to the Emergency Alert system and the Petaluma Emergency Operations Center to keep the public informed during emergencies and disasters. Coordinate operation of this station with KPCA.</p>

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		7-P-24	Ensure that critical facilities, including medical centers, school facilities, and other structures that are important to protecting health and safety in the community, remain operative during emergencies. A. Work with local hospitals and school districts to coordinate planning, communication and response.		7-P-24	Ensure that critical facilities, including medical centers, school facilities, and other structures that are important to protecting health and safety in the community, remain operative during emergencies. A. Work with local hospitals and school districts to coordinate planning, communication and response.
		7-P-28	Expand the capability of the Fire Department to respond to River related emergencies. A. With revitalization of the Downtown and the Petaluma River corridor, along with increased river activities, purchase a new rescue/fire boat and relocate it on the River for better response times and increased opportunities for emergency response.		7-P-28	Expand the capability of the Fire Department to respond to River related emergencies. A. With revitalization of the Downtown and the Petaluma River corridor, along with increased river activities, purchase a new rescue/fire boat and relocate it on the River for better response times and increased opportunities for emergency response.
3.4-4	<i>Development near the Urban Growth Boundary may increase risk from wild land fires due to the proximity of development to open areas of grassland or chaparral.</i>	7-P-19	Maintain a four minute travel time for a total of 6-minute response time for emergencies within the City. A. Require that properties outside of the four-minute (travel) response radii utilize fire-resistant materials and maintain fire breaks surrounding residences. B. Ensure that transportation improvements are provided for additional development so as not to adversely impact emergency response times.	Less than Significant	7-P-27	Reduce the impacts of wildland fires. A. Develop a program and standards to address the increased fire risk associated with development within the Urban Interface areas to the West. B. Continue the annual Weed Abatement Program. C. Continue the regulation of fireworks city wide, D. Consider the prohibition of the sale and use of fireworks within the City, with the exception of city sanctioned and permitted events with appropriate City standards in place.
3.5-1	<i>New development that would result from the proposed General Plan may increase water demand that may exceed available supply.</i>	8-P-1	Optimize the use of imported water from the SCWA to provide adequate water for present and future uses. A. Prepare, implement, and maintain long-term, comprehensive water supply plans and options in cooperation with the appropriate state and federal agencies, regional authorities, water utilities, and local governments. B. Support regional efforts towards ensuring that imported water is reliable, cost-effective, and is of high quality.	Less than Significant	8-P-1	Optimize the use of imported water from the SCWA to provide adequate water for present and future uses. A. Prepare, implement, and maintain long-term, comprehensive water supply plans and options in cooperation with the appropriate state and federal agencies, regional authorities, water utilities, and local governments. B. Support regional efforts towards ensuring that imported water is reliable, cost-effective, and is of high quality.

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		8-P-2	Work toward development and execution of new water supply agreements with SCWA to ensure adequate potable water.		8-P-2	Continue to work to maintain water supply agreements with SCWA to ensure adequate potable water.
		8-P-3	Work with Sonoma County Water Agency on the South Transmission System Project to develop the parallel aqueduct along the City's preferred eastside alignment in order to improve reliability of water supplies.		8-P-3	Work with Sonoma County Water Agency on the South Transmission System Project to develop the parallel aqueduct along the City's preferred eastside alignment in order to improve reliability of water supplies.
		8-P-4	<p>The City shall routinely assess its ability to meet demand for potable water.</p> <p>A. The City shall continue to monitor the demand for water for projected growth against actual use, and ensure that adequate water supply is in place prior to, or in conjunction with, project entitlements.</p> <p>B. The City planning staff will discuss water supply with the developer for each new development early in the planning process and inform Water Resources staff of upcoming demands as provided by the applicant.</p> <p>C. The Community Development Department shall maintain a tiered development record to monitor pending and projected developments to allow a reasonable forecast, by the Water Resources Department, of projected water demand.</p> <p>D. The City shall upgrade utility billing software as necessary to provide the ability to efficiently track and project water demand trends including, but not limited to, the following parameters:</p> <ul style="list-style-type: none"> • Land use categories • Customer classifications 		8-P-4	<p>The City shall routinely assess its ability to meet demand for potable water.</p> <p>A. The City shall continue to monitor the demand for water for projected growth against actual use, and ensure that adequate water supply is in place prior to, or in conjunction with, project entitlements.</p> <p>B. The City planning staff will discuss water supply with the developer for each new development early in the planning process and inform Water Resources staff of upcoming demands as provided by the applicant.</p> <p>C. The Community Development Department shall maintain a tiered development record to monitor pending and projected developments to allow a reasonable forecast, by the Water Resources Department, of projected water demand.</p> <p>D. The City shall upgrade utility billing software as necessary to provide the ability to efficiently track and project water demand trends including, but not limited to, the following parameters:</p> <ul style="list-style-type: none"> • Land use categories • Customer classifications
		8-P-5	<p>Develop alternative sources of water to supplement imported supply.</p> <p>A. Expand the use of recycled water to offset potable demand.</p>		8-P-5	<p>Develop alternative sources of water to supplement imported supply.</p> <p>A. Expand the use of recycled water to offset potable demand.</p> <p>B. Expand water conservation to further improve the efficient</p>

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			<p>B. Expand water conservation to further improve the efficient use of potable water.</p> <p>C. Continue to use groundwater to meet emergency needs.</p>			<p>use of potable water.</p> <p>C. Continue to use groundwater to meet emergency needs.</p>
		8-P-6	The City shall utilize the Water Demand and Supply Analysis Report, June 2006 and any amendments thereto, for monitoring, assessing, and improving the City's municipal water supply.		8-P-6	<p>The City shall utilize the Water Demand and Supply Analysis Report, June 2006 and any amendments thereto, for monitoring, assessing, and improving the City's municipal water supply.</p> <p>A. Require implementation of adopted Water Master Plan through conditions of approval for all public and private development.</p>
		8-P-7	Limit the provision of potable water service to lands within the Urban Growth Boundary with the exception of the provisions outlined in the Urban Growth Boundary measure and incorporated into Chapter 2 Land Use, Growth Management, and the Built Environment.		8-P-7	Limit the provision of potable water service to lands within the Urban Growth Boundary with the exception of the provisions outlined in the Urban Growth Boundary measure and incorporated into Chapter 2 Land Use, Growth Management, and the Built Environment.
3.5-2	<i>New development may result in the need to expand new wastewater treatment facilities, the construction of which may cause significant environmental effects.</i>	8-P-9	<p>Provide tertiary recycled water for irrigation of parks, playfields, schools, golf courses and other landscape areas to reduce potable water demand.</p> <p>A. The City will expand the Ellis Creek Water Recycling Facility to provide tertiary and secondary recycled water as outlined in the Recycled Water Master Plan.</p> <p>B. Operate and maintain the Ellis Creek Water Recycling Facility to produce recycled water to regulatory standards.</p>	Less than Significant	8-P-9	<p>Provide tertiary recycled water for irrigation of parks, playfields, schools, golf courses and other landscape areas to reduce potable water demand.</p> <p>A. Expand the Ellis Creek Water Recycling Facility to provide tertiary and secondary recycled water as outlined in the Recycled Water Master Plan.</p> <p>B. Operate and maintain the Ellis Creek Water Recycling Facility to produce recycled water to meet or exceed current regulatory standards.</p>
		8-P-10	<p>The City may require the use of recycled water through the City entitlement process.</p> <p>A. New development may be required to install a separate recycled water system as deemed necessary and appropriate by the City to offset potable demand.</p> <p>B. The City will evaluate where the most</p>		8-P-10	<p>The City may require the use of recycled water through the City entitlement process.</p> <p>A. New development may be required to install a separate recycled water system as deemed necessary and appropriate by the City to offset potable demand.</p> <p>B. Evaluate where the most appropriate potable water offset</p>

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			appropriate potable water offset improvements can be implemented through the City's entitlement process. C. The City shall determine the appropriate means of potable offset, individual project systems may be required in addition to City-required improvements and/or fees relating to the recycled water offset system.			improvements can be implemented through the City's entitlement process. C. Determine the appropriate means of potable offset. Individual project systems may be required in addition to City-required improvements and/or fees relating to the recycled water offset system.
		8-P-11	The City may continue to work with agricultural users to reuse secondary recycled water. In addition, the City may purchase land as a backup reuse site, if deemed necessary and appropriate to meet system needs.		8-P-11	Continue to work with agricultural users to reuse secondary recycled water. In addition, the City may purchase land as a backup reuse site, if deemed necessary and appropriate to meet system needs.
		8-P-12	The City will provide water of adequate quality and quantity to meet customer needs. The City, at its sole discretion, will determine whether a given customer's supply will be potable water, tertiary recycled water, secondary recycled water, groundwater, or a combination of these.		8-P-12	Provide water of adequate quality and quantity to meet customer needs. The City, at its' sole discretion, during the environmental review and entitlement process, will determine whether a given customer's supply will be potable water, tertiary recycled water, secondary recycled water, groundwater, or a combination of these.
		8-P-13	The City will work to convert existing potable water customers identified under the City's Recycled Water Master Plan to tertiary recycled water as infrastructure and water supply becomes available.		8-P-13	Work to convert existing potable water customers identified under the City's Recycled Water Master Plan to tertiary recycled water as infrastructure and water supply becomes available. A. Require implementation of adopted Recycled Water Program improvements through conditions of approval for all public and private development.
		8-P-14	The water recycling facility shall be operated and maintained in compliance with all State and Federal permit requirements.		8-P-14	The water recycling facility shall be operated and maintained in compliance with all State and Federal permit requirements.
		8-P-15	Capacity of the water recycling facility shall be maintained, and expanded as necessary, to keep pace with the city's growth.		8-P-15	Capacity of the water recycling facility shall be maintained, and expanded as necessary, to keep pace with the city's growth. A. Require implementation of adopted Water Recycling Facility master Plan and distribution program improvements through conditions of approval for all public

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						and private development.
		8-P-16	Comply with the current Statewide General Waste Discharge Requirements concerning the operation and maintenance of the City's sanitary sewer collection system A. Perform condition assessment of existing facilities. B. Survey facilities and maintain current system maps. C. Perform regular cleaning and inspection to help eliminate sanitary sewer overflows. D. Fund collection system infrastructure replacement on a 100-year life cycle. E. Regularly update the sanitary sewer flow model and make improvements necessary to support development.		8-P-16	Comply with the current Statewide General Waste Discharge Requirements concerning the operation and maintenance of the City's sanitary sewer collection system A. Perform condition assessment of existing facilities. B. Survey facilities and maintain current system maps. C. Perform regular cleaning and inspection to help eliminate sanitary sewer overflows. D. Fund collection system infrastructure replacement on a 100-year life cycle. E. Regularly update the sanitary sewer flow model and make improvements necessary to support development.
		8-P-17	Maintain and expand public access and educational opportunities at the Ellis Creek Water Recycling Facility.		8-P-17	Maintain and expand public access and educational opportunities at the Ellis Creek Water Recycling Facility.
3.5-3	<i>The proposed General Plan could result in wasteful, inefficient, or unnecessary consumption of energy by residential, commercial, industrial, or public uses.</i>	4-P-14	Develop and adopt local energy standards that would result in less energy consumption than standards set by the California Energy Commission's (CEC) Title 24. <i>The State of California addresses energy conservation through Title 24 "Energy Efficiency Standards for Residential and Nonresidential Buildings." Whereas Title 24 applies to new buildings, much of the City west of Highway 101 was developed prior to 1953 and there is a tremendous opportunity to encourage greater energy efficiency in Petaluma's older structures. Energy-efficient air conditioners, high-efficiency lighting, photocell dimming, higher insulation levels, and reflective rooftops are examples of standards that could reduce energy consumption in new and existing</i>	Less than Significant	4-P-18	Develop and adopt local energy standards that would result in less energy consumption than standards set by the California Energy Commission's (CEC) Title 24. <i>The State of California addresses energy conservation through Title 24 "Energy Efficiency Standards for Residential and Nonresidential Buildings." Whereas Title 24 applies to new buildings, much of the City west of Highway 101 was developed prior to 1953 and there is a tremendous opportunity to encourage greater energy efficiency in Petaluma's older structures. Energy-efficient air conditioners, high-efficiency lighting and glass, automatic controls for lighting, photocell dimming, higher insulation levels, and reflective rooftops are examples of standards that could reduce energy consumption in new and existing buildings.</i> A. Identify and implement energy conservation measures

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	<p><i>buildings.</i></p> <p>A. Identify and implement energy conservation measures that are appropriate for public buildings.</p> <p>B. Identify energy conservation measures appropriate for retrofitting existing structures. Work with local energy utility to encourage incentive programs for retrofitting. Consider the use of alternative transportation fuels among City-owned vehicles and the Petaluma Transit system to reduce dependence on petroleum-based fuels and improve local air quality. In 2002, the City of Petaluma adopted a Clean City Fleets resolution. The Clean Fleets Program, sponsored by the American Lung Association, directs local government staff to purchase the cleanest vehicle for municipal fleets</p>		<p>that are appropriate for public buildings and facilities, such as:</p> <ul style="list-style-type: none"> • Schedule energy efficiency “tune-ups” of existing buildings and facilities. • Institute a lights-out-at-night policy in all public buildings where feasible. • Continue to retrofit older lighting fixtures in City facilities until all buildings have been upgraded. • Where new traffic signals or crosswalk signals are installed, or existing signals are upgraded, continue to use LED bulbs or other equivalent efficient technology that may develop. • Evaluate the possibility of decreasing the average daily time streets lights are on. • Periodically evaluate the efficiency of potable and sewer pumping facilities and identify measures to improve pumping efficiency. • Encourage the County of Sonoma to upgrade existing, inefficient facilities which serve Petaluma (e.g. potable water pumping facilities). <p>B. Identify energy conservation measures appropriate for retrofitting existing structures. Work with local energy utility to encourage incentive program for retrofitting. Consider the use of alternative transportation fuels among City-owned vehicles and the Petaluma Transit system to reduce dependence on petroleum-based fuels and improve local air quality. Continue to replace traditional fuel vehicles in the City’s fleet with alternative fuel vehicles and/or zero/low emission vehicles, as appropriate. When selecting alternative fuel vehicles consider the “full cycle” of emissions for the different fuel types.</p> <p><i>In 2002, the City of Petaluma adopted a Clean City Fleets</i></p>

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					<p><i>resolution. The Clean Fleets Program, sponsored by the American Lung Association, directs local government staff to purchase the cleanest vehicle available for municipal fleets.</i></p> <p>C. Investigate and implement alternative sources of renewable power (e.g. solar photovoltaic) to supply City facilities, solar water heating at the Petaluma Swim Center, and cogeneration at the Ellis Creek Water Recycling Facility.</p>
		4-P-15	<p>Encourage use and development of renewable or nontraditional sources of energy.</p> <p>A. Participate in state and local efforts to develop appropriate policies and review procedures for the institution of renewable energy sources such as solar, wind, geothermal, and hydroelectric power.</p> <p><i>One such effort began in August 2005, when the City adopted a resolution requiring developers of residential projects of 5 or more units to wire all units for future photo voltaic arrays.</i></p> <p><i>In addition, the State's Emerging Renewables Buydown Program provides rebates to consumers who install qualifying energy systems, such as photo voltaic wind turbines, and fuel cells. As of July 2005, nearly 80 participants from within Petaluma have been involved with the program through the use of solar energy systems.</i></p> <p>B. Adopt green building code to allow use of alternative building materials and methods, under a discretionary review process.</p> <p>C. Work with the Petaluma Area Chamber of Commerce and PG&E in encouraging local businesses to undertake energy audits and implement energy reduction improvements.</p>	4-P-19	<p>Encourage use and development of renewable or nontraditional sources of energy.</p> <p>A. Participate in state and local efforts to develop appropriate policies and review procedures for the institution of renewable energy sources such as solar, wind, geothermal, and hydroelectric power.</p> <p><i>One such effort began in August 2005, when the City adopted a resolution requiring developers of residential projects of 5 or more units to wire all units for future photo voltaic arrays.</i></p> <p><i>In addition, the State's Emerging Renewables Buydown Program provides rebates to consumers who install qualifying energy systems, such as photo voltaic, wind turbines, and fuel cells. As of July 2005, nearly 80 participants from within Petaluma have been involved with the program through the use of solar energy systems.</i></p> <p>B. Implement green building code to allow use of alternative building materials and methods, under a discretionary review process.</p> <p>C. Work with the Petaluma Area Chamber of Commerce and PG&E in encouraging local businesses to undertake energy audits and implement energy reduction improvements.</p> <p>D. Consider the feasibility of requiring a percentage of new development to meet 50% of their energy needs from fossil fuel alternatives (e.g. solar panels, etc.).</p>

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			D. Consider the feasibility of requiring a percentage of new development to meet 50% of their energy needs from fossil fuel alternatives (e.g., solar panels, etc.).			
3.5-4	<i>The proposed General Plan could require the need for additional energy facilities, the construction of which could have significant environmental impacts.</i>	NA		Less than Significant		See 4-P-19, above.
3.5-5	<i>The proposed General Plan could cause a substantial increase in transportation energy consumption due to the projected increases in trips associated with future population and employment growth.</i>	5-P-13	<p>Encourage existing major employers to develop and implement Transportation Demand Management programs to reduce peak-period trip generation.</p> <ul style="list-style-type: none"> A. Study the feasibility of a citywide TDM program that would be funded by annual fees or assessments on new development. B. Assign a proportion of TDM fees to Petaluma Transit for expansion of service and future fare reductions or fare elimination. C. As part of the development code, require TDM measures for all new non-residential development. D. Assign trip reduction credits and reduced transportation impact fees for demonstrated commitment to TDM strategies. E. Reduce parking requirements for mixed-use developments and for developments providing shared parking or a TDM program. 	Less than Significant	5-P-1	See Impact 3.10-1, policy 5-P-13

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			<p>F. Establish a TDM program for City of Petaluma employees.</p> <p>G. Collaborate with Santa Rosa Junior College to minimize the impact of future enrollment growth on local traffic and parking demand, such as through TDM measures, limitations on parking near the College and on-campus parking management.</p>			
3.5-6	<i>New development may result in increased demand for solid waste disposal at the County landfill.</i>	4-P-16	Continue to work toward reducing solid waste and increasing recycling, in compliance with the Countywide Integrated Waste Management Plan (CoIWMP).	Less than Significant	4-P-21	<p>Reduce solid waste and increase recycling, in compliance with the Countywide Integrated Waste Management Plan (CoIWMP).</p> <p>A. Work with Sonoma County to identify environmental and economical means to meet the need for solid waste disposal.</p> <p>B. Require new or remodeled multifamily residential and all non-residential development to incorporate sufficient, attractive, and convenient interior and exterior storage areas for recyclables and green waste.</p> <p>C. Continue to encourage waste reduction and recycling at home and in businesses through public education programs, such as informational handouts, on recycling, yard waste, wood waste, and hazardous waste.</p> <p>D. Develop a residential and commercial food waste composting program.</p> <p>E. Purchase goods containing recycled materials for City use.</p> <p>F. Continue to cooperate, require, and/or support the operation of resource recovery facilities by the City waste hauler and the disposal site operators.</p> <p>G. Investigate and replace bottled water in City offices with alternate source of drinking water.</p> <p>H. Ensure that all public facilities have adequate and accessible depositories for recyclables.</p>
		4-P-17	Work with Sonoma County to identify environmental and economical means to meet the need for solid			See 4-P-21.A.

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			waste disposal.			
		4-P-18	Require new or remodeled multifamily residential and all non-residential development to incorporate attractive and convenient interior and exterior storage areas for recyclables.			See 4-P-21.B.
		4-P-19	Continue to encourage waste reduction and recycling at home and in businesses through public education programs, such as information handouts on recycling, yard waste, wood waste, and hazardous waste.			See 4-P-21.C.
		4-P-20	Consider development of a residential and commercial food waste composting program.			See 4-P-21.D.
		4-P-21	Purchase goods containing recycled materials for City use, to the extent possible.			See 4-P-21.E.
					4-P-22	Require future waste contract negotiations to include the following: A. Disposal of City waste products at a site with the least potential for environmental impacts. B. Discussion on resource recovery services for Petaluma waste. C. The identification of recycling and waste stream diversion goals.
3.6-1	<i>Buildout of the General Plan 2025 may degrade water quality.</i>	8-P-37	Due to potential positive impact to increased water discharge, all development activities shall be constructed and maintained in accordance with Phase 2 National Pollutant Discharge Elimination System (NPDES) permit requirements. A. The Water Resources and Conservation Department shall review, and have the authority to conditionally approve: all development permits to insure compliance with NPDES Phase 2 requirements (adopted 2003 or thereafter amended). B. Maintain, update as needed, and implement the City's Storm Water Management Plan to retain	Less than Significant	8-P-39	All development activities shall be constructed and maintained in accordance with Phase 2 National Pollutant Discharge Elimination System (NPDES) permit requirements. A. The Water Resources and Conservation Department shall review, and have the authority to conditionally approve, all development permits to insure compliance with NPDES Phase 2 requirements. B. Maintain, update as needed, and implement the City's Storm Water Management Plan to retain a current storm water discharge permit with the California Regional Water Quality Control Board. C. A funding mechanism, such as a storm water utility fee connected to the waste water collection fee, shall be

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			a current storm water discharge permit with the California Regional Water Quality Control Board.			implemented by the City to insure a dedicated source of funds is available for all surface water drainage system maintenance and improvement needs.
3.6-2	<i>Buildout of the General Plan 2025 may increase depletion of groundwater supply or substantially interfere with groundwater recharge.</i>	8-P-20	<p>Manage groundwater as a valuable and limited shared resource by protecting potential groundwater recharge areas and stream sides from urban encroachment within the Petaluma watershed.</p> <p>A. The City will use discretionary permits to control construction of impervious surfaces in groundwater recharge areas. Potential recharge area protection measures at sites in groundwater recharge areas include, but are not limited to:</p> <ul style="list-style-type: none"> • Restrict coverage by impervious materials; • Limit building or parking footprints; • Require construction of percolation ponds on site; • Require surface drainage swales. <p>B. Urge the County when receiving development applications to examine the combined impacts of new septic tanks placed in proximity to wells. The County should examine the cumulative impacts of the allowed development densities in the West Petaluma Specific Plan area and compare the results to established water quality standards. Test wells should be required prior to issuing any building permits.</p>	Less than Significant	8-P-20	<p>Manage groundwater as a valuable and limited shared resource by protecting potential groundwater recharge areas and stream sides from urban encroachment within the Petaluma watershed.</p> <p>A. The City will use discretionary permits to control construction of impervious surfaces in groundwater recharge areas. Potential recharge area protection measures at sites in groundwater recharge areas include, but are not limited to:</p> <ul style="list-style-type: none"> • Restrict coverage by impervious materials; • Limit building or parking footprints; • Require construction of percolation ponds on site; • Require surface drainage swales. <p>B. Urge the County when receiving development applications to examine the combined impacts of new septic tanks placed in proximity to wells and the ability to maintain adequate protection of groundwater resources. The County should examine the cumulative impacts of the allowed development densities in the West Petaluma Specific Plan area and compare the results to established water quality standards. Test wells should be required prior to issuing any building permits.</p>
3.6-3	<i>Buildout of the proposed General Plan may increase drainage flows as a result of</i>	8-P-28	The area upstream of the Corps weir, and below the confluence to Willowbrook Creek with the Petaluma River, located within the 1989 FEMA floodplain (and any amendments thereto) and adjacent to the Petaluma River, shall include a Petaluma River Corridor (PRC) set aside for the design and	Less than Significant	8-P-28	The area upstream of the Corps weir, and below the confluence to Willowbrook Creek with the Petaluma River, located within the 1989 FEMA floodplain (and any amendments thereto) and adjacent to the Petaluma River, shall include a Petaluma River Corridor (PRC) set aside for the design and construction of a flood terrace system to allow the River to accommodate a 100-

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<p><i>impervious surfaces, thereby altering the existing drainage patterns.</i></p>		<p>construction of a flood terrace system to allow the River to accommodate a 100-year storm event within a modified River channel.</p> <p>A. The Water Resources and Conservation Department shall work with the Community Development Department, through the project entitlement process, to insure the PRC is implemented at the cost of the development.</p> <p>B. Maintenance, in perpetuity, of the PRC and applicable flood terrace, storm water flow capacity, environmental habitat and public access improvements shall be maintained, through a funding mechanism approved by the City, as a condition of project entitlement.</p>			<p>year storm event within a modified River channel, to the extent feasible given existing physical and natural constraints.</p> <p>A. The Water Resources and Conservation Department shall work with the Community Development Department, through the project entitlement process, to insure the PRC is implemented at the cost of the development.</p> <p>B. Maintenance, in perpetuity, of the PRC and applicable flood terrace, storm water flow capacity, environmental habitat and public access improvements shall be maintained, through a funding mechanism approved by the City, as a condition of project entitlement.</p>
	8-P-29	<p>Working with SCWA and the Sonoma County Board of Supervisors, the City shall identify the necessary setbacks for the Willowbrook, Marin, and Liberty Creek corridors within the Petaluma Planning Referral Area to include a Creek Corridor set aside for the design and construction of a flood terrace system to allow the Creeks to accommodate a 100 year storm event within a modified creek channel.</p> <p>A. The City Water Resources and Conservation Department shall work with the SCWA to implement the Petaluma River Watershed Master Drainage Plan (SWCA, June 2003 or future update).</p> <p>B. The City Water Resources and Conservation Department shall work with the SCWA to study the feasibility, and subsequently implement, a regional serving detention/retention basin system to reduce localized flooding, provide seasonal agricultural water sources, and offer</p>		8-P-29	<p>The City of Petaluma, SCWA, Sonoma County and other responsible agencies shall be encouraged to work together in order to create and adopt a flood management plan, or plan amendment to the Petaluma River Watershed Master Drainage Plan (SCWA, June 2003), for the Petaluma River watershed implementing the following regional surface water solutions:</p> <p>A. Establish a creek corridor Creek setback for the design and construction of a flood terrace system to allow Willowbrook, Marin, and Liberty Creeks to accommodate a 100 year storm event within a modified creek channel, to the extent possible given natural and physical constraints.</p> <p>B. Within a 200' setback from centerline of the River (outside of City limits) and Willowbrook, Marin, and Liberty Creeks the City shall work with Sonoma County to create interim development standards for that setback area until such time as studies are concluded and approved by Sonoma County, the SCWA, the City of Petaluma, and other responsible agencies. Thereafter all lands affected shall set aside the necessary river and/or creek corridor areas</p>

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			<p>opportunities to enhance recharge of the Petaluma aquifers.</p> <p>C. The City shall, in accordance with the XP-SWMM analysis of the Petaluma River corridor, work with the regulatory and advisory agencies and property owners along the River to implement the identified physical improvements to accommodate the 100-year storm event within a modified River channel.</p> <p>D. The City shall, in accordance with the SCWA, undertake a study to assess and define the corridor section widths necessary to quantify the volume and dimension of a creek corridor system necessary to allow the W, M, and L creeks to accommodate the 100-year storm event.</p> <p>E. Setbacks beyond the creek to allow additional peak flows shall be considered on a reach by reach basis. Alternative land uses for seasonal use may be considered within this additional setback area.</p>			<p>and, as development occurs, shall undertake the identified surface water containment enhancement improvements to accommodate improvements envisioned in Program A, above.</p> <p>C. The City will work with the County to ensure that zero net fill policies are enforced within the unincorporated area for areas within the regulatory floodplain of the Petaluma River and its tributaries.</p> <p>D. Working with Sonoma County, the City shall develop a plan and identify funding opportunities to acquire and remove existing structures within the regulatory floodway of the Petaluma River and its tributaries. The Plan shall be updated as needed to maintain consistency with changes in regulatory mapping of the floodway.</p> <p>E. Participate with the County in implementation of the regional components of the Petaluma River Watershed Master Drainage Plan (SCWA, June 2003), Petaluma River Floodplain Management Plan (City of Petaluma, October 2001, Petaluma River Access and Enhancement Plan (City of Petaluma, May 1006, Sonoma County General Plan 2020 (Public Safety Element) and the City of Petaluma General Plan 2025.</p>
		8-P-30	<p>Within a 200' setback from centerline of the River and creeks referenced in Policies 3-P-28 and 2-P-29, stated above [in the General Plan], no development shall be permitted on lands within that 400' wide corridor until such time as the study is concluded and approved by the SWCA and City of Petaluma. Thereafter all lands affected shall set aside the necessary river and/or creek corridor areas and, as development occurs, shall undertake the identified surface water containment enhancement improvements.</p> <p>A. The watershed model, XP-SWMM or updates thereto, shall be maintained, in</p>		8-P-30	<p>Within a 200' setback from centerline of the Petaluma River, within the UGB, no additional development shall be permitted on lands within that 400' wide corridor, given natural and physical constraints, until such time as the study is concluded and approved by the SCWA and City of Petaluma. Thereafter all lands affected shall set aside the necessary river and/or creek corridor areas and, as development occurs, shall undertake the identified surface water containment enhancement improvements.</p> <p>A. The watershed model, XP-SWMM or updates thereto, shall be maintained, in cooperation between the City and SCWA, to assist in the evaluation of development</p>

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			<p>cooperation between the City and SCWA, to assist in the evaluation of development proposals and in the design of regional watershed improvements to reduce flood elevations.</p> <p>B. Proposed development applications may be charged a model update fee to cover costs associated with evaluating a specific proposal for project specific and cumulative impacts to the regional surface water system.</p> <p>C. On-site and off-site improvements, deemed necessary by the City of Petaluma, to reduce the surface water impacts associated with a specific development proposal shall be designed, constructed, and maintained in perpetuity at the cost of the development associated with said impacts.</p>			<p>proposals and in the design of regional watershed improvements to reduce flood elevations.</p> <p>B. Proposed development applications may be charged a model update fee to cover costs associated with evaluating a specific proposal for project specific and cumulative impacts to the regional surface water system.</p> <p>C. On-site and off-site improvements, deemed necessary by the City of Petaluma, to reduce the surface water impacts associated with a specific development proposal shall be designed, constructed, and maintained in perpetuity at the cost of the development associated with said impacts.</p>
		8-P-31	<p>In accordance with the studies undertaken for the Corps Flood Protection Project, existing areas subject to periodic surface water inundation and containment, within the Corona and Denman Reaches (Lynch Creek confluence with the Petaluma River upstream to the Old Redwood Highway over-crossing of Willowbrook Creek), shall be preserved and enhanced where feasible to reduce localized flooding.</p> <p>A. The Department of Water Resources and Conservation shall work with the SWCA and the Community Development Department to insure that reduction of the protection afforded by the Payran Corps Flood Protection Project is not compromised or reduced by proposed development.</p>		8-P-31	<p>In accordance with the studies undertaken for the Corps Flood Protection Project, existing areas subject to periodic surface water inundation and containment, within the Corona and Denman Reaches (Lynch Creek confluence with the Petaluma River upstream to the Old Redwood Highway over-crossing of Willowbrook Creek), shall be preserved and enhanced where feasible to reduce localized flooding.</p> <p>A. The Department of Water Resources and Conservation shall work with the SCWA and the Community Development Department to insure that reduction of the protection afforded by the Payran Corps Flood Protection Project is not compromised or reduced by proposed development.</p> <p>B. Continue to work with SCWA for the on-going efforts to maintain or improve historic channel capacity for flood waters.</p>
		8-P-32	Areas within the Petaluma watershed, outside of the		8-P-	Areas within the Petaluma watershed, outside of the City of

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			<p>City of Petaluma, which are subject to periodic surface water inundation and containment, should not be modified in any manner to reduce the historic storage characteristics and capacity.</p> <p>The City shall work with the County of Sonoma to prohibit placement of fill materials within those areas identified as having historic storage capacity, which have a detrimental impact on downstream flows, including the increase in peak discharge volumes in the downstream areas.</p>		32	<p>Petaluma, which are subject to periodic surface water inundation and containment, should not be modified in any manner to reduce the historic storage characteristics and capacity.</p> <p>A. Department of Water Resources & Conservation shall work with Sonoma County, SCWA, and other responsible agencies to preserve and expand detention basin capacity within the Petaluma River watershed and maintain or reduce peak discharge volumes from Willowbrook, Marin, Liberty and Lichau Creeks.</p> <p>B. The City shall work with the County of Sonoma to establish a zero net fill policy for detention basins and areas within the regulatory floodplain within the Petaluma River watershed in order to preserve and enhance basin capacity and to ensure no detrimental impact to downstream flows, including the increase in peak discharge volumes in the downstream areas.</p>
		<p>Mitigation Measure</p> <p>3.6(a) Use flood terracing in the Corona and Denman Reaches, maintain surface water drainage swales along Highway 101, install flap gates or valves to eliminate the backflow of surface waters from the east side of Highway 101 to the west side, which adversely impact residential areas, and increase berm heights that presently protect residential areas such as Leisure Lake and along Corona Creek between Youngstown and Petaluma Estates Mobilehome Parks. Understanding the out-of-bank impacts associated with the lower intensity storms (10, 25, and 50) may allow incremental enhancements of the River corridor to increase capacity without adversely impacting peak flows, while enhancing riparian habitats and providing public access amenities.</p>				
3.6-4	<i>New development may overload storm drain</i>	8-P-33	Work with SWCA to insure maintenance of the engineered channels, natural creeks, and enclosed surface water system.	Less than Significant	8-P-36.A.	Work with SCWA, regulatory agencies, and/or property owners, as appropriate given maintenance authority, to insure maintenance of the engineered channels, natural creeks, and enclosed surface water system.

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	<i>system capacity or require expansion of existing or construction of new facilities.</i>				
		8-P-34	Work with regulatory and advisory agencies to facilitate preservation and environmental enhancement of the natural corridor for species of importance and native to the area.		See Policy 8-P-32, above
		8-P-35	Promote public education and stewardship of the riparian corridor.		8-P-36.C. Promote public education and stewardship of the riparian corridor.
		8-P-36	Work with the U.S. Army Corps of Engineers to dredge the river channel downstream of the constriction weir to maintain the 100-year designed conveyance capacity and navigable channel.		8-P-36.D and E D. Work with the U.S. Army Corps of Engineers to dredge the river channel downstream of the transition weir to maintain the 100-year design conveyance capacity and navigable channel. E. Initiate the formation of an Assessment District, or other funding mechanism, to ensure periodic dredging occurs and the dredge materials disposal site is maintained.
		Mitigation Measure 3.6(b) The continuation of zero-net fill and when appropriate, zero-net runoff, within the Development Code will be utilized to assess site-specific impacts and identify mitigations associated with storm drain pipe capacities. In addition, creation of flood terrace improvements shall be used to enhance the riparian corridor for wildlife habitats and improve public access, education and stewardship of the River and creek corridors.			
3.6-5	<i>Buildout of the proposed General Plan 2025 may expose people or structures to risk of existing</i>		Policies 8-P-28 through 8-P-32 (see Impact 3.6-3)	Less than Significant	See Impact 3.6-3 and applicable policies and programs, as well as policies below.

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<p><i>flooding hazards, or may place structures which could impede or redirect flood flows.</i></p>			
	<p>Mitigation Measure 3.6(c) Include the following policy and programs in the proposed General Plan. Policy 8-P-X. No new inhabited structure or development shall be entitled within the 100-year General Plan buildout flood boundary until such time as data is available to provide a 100-year base flood elevation, utilizing the current hydrologic information from the City's XP-SWMM, for the specific site to determine minimum floor elevations.</p> <ul style="list-style-type: none"> A. The City shall create and maintain a 2-D model of the Petaluma River within the City of Petaluma and work with SCWA to achieve a 2-D model for the Petaluma Watershed. B. Utilizing the 2-D model, the City of Petaluma will work with SCWA to identify, design, fund, and construct regional solutions to minimize the flooding impacts associated with historic and increasing out-of-bank flows which occur from increasing storm flow and velocity from out-of-City areas into the City. C. Working with Sonoma County, the City will continue to ensure that zero net fill policies are enforced within the unincorporated area for areas encumbered by the regulatory floodplain of the Petaluma River. D. Utilizing an approved modeling tool, the City shall diligently pursue the remapping of the regulatory Floodway and Floodplain, through the Corps of Engineers, following the completion of the Payran Reach Corps project. E. Working with Sonoma County, the City shall pursue State and Federal funding opportunities to acquire 		<p>Policy 8-P-37. No new inhabited structure or development shall be entitled within that portion of properties containing areas of water depths exceeding one foot as illustrated in Figure 3.6-5 (<i>FEIR Figure reference will be amended to correspond with Chapter 8 Water Resources within the General Plan</i>).</p> <ul style="list-style-type: none"> A. The City shall maintain a 2-D model of the Petaluma River within the City of Petaluma and continue to work with SCWA to achieve a 2-D model for the Petaluma Watershed. B. Utilizing the 2-D model, the City of Petaluma will work with SCWA to identify, design, fund, and construct regional solutions to minimize the flooding impacts associated with historic and increasing out-of-bank flows which occur from increasing storm flow and velocity from out-of-City areas into the City. C. Working with Sonoma County, the City will continue to ensure that zero net fill policies are enforced within the unincorporated area for areas encumbered by the regulatory floodplain of the Petaluma River. D. Utilizing an approved modeling tool, the City shall diligently pursue the remapping of the regulatory Floodway and Floodplain, through the Corps of Engineers, following the completion of the Payran Reach Corps project. E. Working with Sonoma County, the City shall pursue State and Federal funding opportunities to acquire and demolish housing, which remain located within the regulatory Floodway, once remapping occurs. F. Until remapping of the regulatory floodplain occurs,

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			and demolish housing, which remain located within the regulatory Floodway, once remapping occurs.			<p>new residential development in the 100-year flood boundary area, with depths of less than one foot of water during a 100-year storm event will be required to elevate the lowest floor two feet (2') above the BFE as determined by the City 2-D model.</p> <p>G. New non-residential development in the 100-year flood boundary area with less than one foot of water depth during a 100-year storm event will be required to provide flood protection at least 1 foot above the BFE, or elevate the lowest floor two feet above the BFE.</p> <p>H. Residential development shall be prohibited on the first floor of structures within the regulatory floodplain.</p>
3.6-6	<i>Buildout of the General Plan 2025 may require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</i>		Policy 8-P-29 (see Impact 3.6-3).	Less than Significant		See Policy 8-P-30 (Impact 3.6-3)
3.7-1	<i>Buildout of the proposed General Plan would expose people or structures to strong seismic groundshaking or seismic-related ground failure.</i>	10-P-1	<p>Require geotechnical studies prior to development approval in geologic and/or seismic hazard areas. Require or undertake comprehensive geologic and engineering studies for critical structures regardless of location.</p> <p><i>Critical structures are those most needed following a disaster or those that would pose hazards of their own if damaged. They include utility centers and substations, water reservoirs, hospitals, fire stations, police and emergency communications facilities, and</i></p>	Less than Significant	10-P-1	<p>Require geotechnical studies prior to development approval in geologic and/or seismic hazard areas. Require or undertake comprehensive geologic and engineering studies for critical structures regardless of location.</p> <p><i>Critical structures are those most needed following a disaster or those that would pose hazards of their own if damaged. They include utility centers and substations, water reservoirs, hospitals, fire stations, police and emergency communications facilities, and bridges and overpasses.</i></p>

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			<i>bridges and overpasses.</i>			
		10-P-4	Adopt and amend as needed updated versions of the California Building Code (CBC) so that optimal earthquake-protection standards are used in construction and renovation projects. <i>Earthquake-resistant design and materials must meet or exceed the current seismic engineering standards of the CBC Seismic Zone 4 requirements.</i>		10-P-4	Adopt and amend as needed updated versions of the California Building Code (CBC) so that optimal earthquake-protection standards are used in construction and renovation projects. <i>Earthquake-resistant design and materials must meet or exceed the current seismic engineering standards of the CBC Seismic Zone 4 requirements.</i>
		10-P-5	Explore programs that would encourage, assist, or provide incentives to property owners to retrofit their buildings for seismic safety.		10-P-5	Explore programs that would encourage, assist, or provide incentives to property owners to retrofit their buildings for seismic safety.
					10-P-6	Protect the community from risks associated with seismically induced surface ruptures, ground-shaking, ground failure, slope instability leading to mudslides and landslides, subsidence, liquefaction, and other seismic, geologic, and fire hazards. A. Adopt and maintain a Hazard Mitigation Plan (HMP) in compliance with applicable state and federal regulations.
3.7-2	<i>Development under the proposed General Plan would be subject to risk from settlement and/or subsidence of land, lateral spreading, or expansive soils, creating substantial risks to life or property.</i>	NA		Less than Significant		
3.7-3	<i>Buildout of the proposed General Plan</i>	10-P-2	On sites with slopes greater than 30 percent, require all development to be clustered outside of the 30 percent slope areas (and preferably on land less	Less than Signifi	10-P-2	On sites with slopes greater than 30 percent, require all development to be clustered outside of the 30 percent slope areas (and preferably on land less than 15 percent in slope)

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<i>would result in soil erosion.</i>		than 15 percent in slope) where possible.	cant		where possible.
	10-P-3	<p>Regulate the grading and development of hillside areas for new urban land uses, by instituting a Hillside Overlay or other similar mechanism in the Development Code. Ensure that new development on hillsides is constructed to reduce erosion and land-slide hazards:</p> <ul style="list-style-type: none"> • Limit cut slopes to 3:1, except where an engineering geologist can establish that a steeper slope would perform satisfactorily over the long term. • Encourage use of retaining walls or rock-filled crib walls as an alternative to high cut slopes. • Ensure revegetation of cut-and-fill slopes to control erosion. Plant materials for revegetation should not be limited to hydro-seeding and mulching with annual grasses. Trees add structure to the soil and take up moisture while adding color and diversity. • Ensure blending of cut-and-fill slopes within existing contours, and provision of horizontal variation, in order to mitigate the artificial appearance of engineered slopes. • Ensure structural integrity of sites previously filled before approving redevelopment. <p>See also [General Plan] Chapter 2: Land Use, Growth Management and the Built Environment and [General Plan] Chapter 3: Community Design Character and Sustainable Building for additional</p>		10-P-3	<p>Regulate the grading and development of hillside areas for new urban land uses, by instituting a Hillside Overlay or other similar mechanism in the Development Code. Ensure that new development on hillsides is constructed to reduce erosion and landslide hazards and in compliance with any City hillside regulations, including, but not limited to:</p> <ul style="list-style-type: none"> • Limit cut slopes to 3:1, except where an engineering geologist can establish that a steeper slope would perform satisfactorily over the long term. • Encourage use of retaining walls or rock-filled crib walls as an alternative to high cut slopes. • Ensure revegetation of cut-and-fill slopes to control erosion. Plant materials for revegetation should not be limited to hydro-seeding and mulching with annual grasses. Trees add structure to the soil and take up moisture while adding color and diversity. • Ensure blending of cut-and-fill slopes within existing contours, and provision of horizontal variation, in order to mitigate the artificial appearance of engineered slopes. Ensure structural integrity of sites previously filled before approving redevelopment. <p><i>See also General Plan Chapter 2: Land Use, Growth Management, and the Built Environment and Chapter 3: Community Design Character and Sustainable Building for additional hillside policies and programs.</i></p>

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Significance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
			hillside policies and programs.			
3.8-1	<i>Implementation of the proposed General Plan could result in substantial adverse effects on special status fish species or their habitat.</i>	4-P-1	<p>Protect and enhance the Petaluma River and its tributaries through a comprehensive river management strategy of the following programs:</p> <p>Implement the Petaluma River Access and Enhancement Plan including expanded improvements identified through project specific environmental assessment.</p> <p>A. Institute and maintain public access to and along the entire length (on one or both sides), of the river while ensuring that natural resources and river dependent industry are protected.</p> <p>B. Require design review to address the relationship and stewardship of that project to the river or creek for any development on sites with frontage along the river and creeks, identified on Figure 1-3 (of the General Plan).</p> <p>C. Create setbacks for tributaries extending a minimum of 50 feet outward from the top of each bank, with extended buffers where significant habitat areas, vernal pools, or wetlands exist. Development shall not occur within this setback, except as part of greenway enhancement (for example, trails and bikeways). Where there is degradation within the zone, restoration of the natural creek channels and riparian vegetation is mandatory.</p> <p>D. Facilitate compliance with Phase II standards of the National Pollutant Discharge Elimination System (NPDES) to improve the water quality and aesthetics of the river and creeks.</p> <p>E. Work with the State Lands Commission, State Department of Fish and Game, the Sonoma County Water Agency, and other jurisdictional agencies on preservation/enhancement of the</p>	Less than Significant	4-P-1	<p>Protect and enhance the Petaluma River and its tributaries through a comprehensive river management strategy of the following programs:</p> <p>A. Implement the Petaluma River Access and Enhancement Plan including expanded improvements identified through project specific environmental assessment.</p> <p>B. Institute and maintain public access to and along the entire length (on one or both sides), of the river while ensuring that natural resources and river dependent industry are protected.</p> <p>C. Require design review to address the relationship and stewardship of that project to the river or creek for any development on sites with frontage along the river and creeks.</p> <p>D. Create setbacks for all tributaries to the Petaluma River extending a minimum of 50 feet outward from the top of each bank, with extended buffers where significant habitat areas, vernal pools, or wetlands exist. Development shall not occur within this setback, except as part of greenway enhancement (for example, trails and bikeways). Where there is degradation within the zone, restoration of the natural creek channels and riparian vegetation is mandatory at time of adjacent development.</p> <p>E. Facilitate compliance with Phase II standards of the National Pollutant Discharge Elimination System (NPDES) to improve the water quality and aesthetics of the river and creeks.</p> <p>F. Work with the State Lands Commission, State Department of Fish and Game, the Sonoma County Water Agency, and other jurisdictional agencies on preservation/enhancement of the Petaluma River as a component of reviewing major development along the River.</p>

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	<p>Petaluma River as a component of reviewing major development along the River.</p> <p>F. Expand the planting and retention of trees along the upper banks of the river and creeks to reduce ambient water temperature and shade out invasive, non-native species.</p>		<p>G. Expand the planting and retention of trees along the upper banks of the river and creeks to reduce ambient water temperature and shade out invasive, non-native species.</p> <p>H. Revise the Development Code to include:</p> <ul style="list-style-type: none"> • Standards for the four management zones that run the entire length of the river: 1) Restoration Zone, 2) Buffer Zone, 3) Preservation Zone, and 4) River Oriented Development Zone. These standards shall be based on the River Plan's text and sections A-A through O-O as augmented by the cross-section needs identified through the XP-SWMM analyses; • Design review requirements as articulated in the River Plan for any development on sites with frontage along the river or within 100 ft. of the river; • The use of transfer of development rights (TDR) from portions adjacent to the river to elsewhere on the parcel by allowing property owners an increase in residential densities or in allowable Floor-to-Area-Ratio (FAR) and/or smaller/clustered lots to compensate for the loss of development opportunity on land within the Restoration, Buffer, or Preservation zones of the River Plan. The overall development potential on a site shall be consistent with the General Plan. TDRs shall not be applied to lands within the Floodway as there is no development potential within the Floodway. <p>I. Develop a consistent design for site furniture, a wayfinding system, and educational signage in the PRC and along the creeks and tributaries leading to it to heighten the recognition and value of the river and its ecosystem.</p> <p>J. Utilize the Parks and Recreation, Water Resources & Conservation, Public Works departments, and/or property owners (i.e. Landscape Assessment Districts) to manage</p>

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						<p>the long term operations, maintenance responsibilities, and stormwater capacity associated with the river and tributary greenways.</p> <p>K. Prohibit placement of impervious surfaces in the Floodway (i.e. Parking lots, roadways, etc.) with the exception of pathways and emergency access improvements.</p> <p>L. Continue to implement, where appropriate, flood terrace improvements to reduce localized flooding in concert with habitat enhancement projects.</p> <p>M. Cooperate with State and Federal agencies to address and/or eradicate issues and environmental problems associated with possible infestation of the Midden Crab into the Petaluma River and adjacent tributaries.</p>
		4-P-3	<p>Conserve wildlife ecosystems and sensitive habitat areas in the following order of protection preference: 1) avoidance, 2) on-site mitigation, and 3) off-site mitigation.</p> <p>A. Utilize Technical Memorandum 3: Biological Resources Review as a baseline document, expanding to address project specific impacts.</p>		4-P-2	<p>Conserve wildlife ecosystems and sensitive habitat areas in the following order of protection preference: 1) avoidance, 2) on-site mitigation, and 3) off-site mitigation.</p> <p>A. Utilize Technical Memorandum 3: Biological Resources Review as a baseline document, expanding to address project specific impacts.</p>
		4-P-4	<p>Protect special status species and supporting habitats within Petaluma, including species that are State or Federal listed as endangered, threatened, or rare (shown in Table 4.1-1 of the General Plan).</p> <p>A. As part of the development review process, site-specific biological resource assessments are required to consider the impacts on riparian and aquatic resources and the habitats they provide for invertebrates, fish, amphibians, reptiles, birds, mammals, and plants. If development is located outside these ecologically sensitive regions, no site-</p>		4-P-3	<p>Protect special status species and supporting habitats within Petaluma, including species that are State or Federal listed as endangered, threatened, or rare (shown in Table 4.1-1 of the General Plan).</p> <p>A. As part of the development review process, site-specific biological resource assessments are required to consider the impacts on riparian and aquatic resources and the habitats they provide for invertebrates, fish, amphibians, reptiles, birds, mammals, and plants. If development is located outside these ecologically sensitive regions, no site-specific assessment of biological resources may be necessary. Appropriate mitigation measures to reduce impacts to sensitive habitats and special status species</p>

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			<p>specific assessment of biological resources may be necessary. Appropriate mitigation measures to reduce impacts to sensitive habitats and special status species would be imposed on a project-by-project basis according to Petaluma's environmental review process.</p> <p>B. Review all development proposals along the navigable portion of the river to determine that they are designed to encourage long-term retention of river-dependent uses to the extent feasible.</p>		<p>would be imposed on a project-by-project basis according to Petaluma's environmental review process.</p> <p>B. Review all development proposals along the navigable portion of the river to determine that they are designed to encourage long-term retention of river-dependent uses to the extent feasible.</p>
		4-P-5	<p>Continue to support rural land use designations and Agricultural Best Management Practices within the Sonoma County General Plan.</p> <p>A. Coordinate with Sonoma County's Agricultural Preservation and Open Space District, Permit and Resource Management Department, and Water Agency to protect riparian corridors and critical biological habitats as well as to reduce cumulative impacts on sensitive watershed areas outside of the city limits.</p> <p>B. Work with County, State and federal agencies to ensure that development within the Planning Referral Area does not substantially affect State or federally listed rare, endangered, or threatened species or their habitats. Require assessments of biological resources prior to approval of any development in or within 300 feet of ecologically sensitive areas.</p>		<p>4-P-4</p> <p>Continue to support rural land use designations and Agricultural Best Management Practices within the Sonoma County General Plan.</p> <p>A. Coordinate with Sonoma County's Agricultural Preservation and Open Space District, Permit and Resource Management Department, and Water Agency to protect riparian corridors and critical biological habitats as well as to reduce cumulative impacts on sensitive watershed areas outside of the city limits.</p> <p>B. Work with County, State and federal agencies to ensure that development within the Planning Referral Area does not substantially affect State or federally listed rare, endangered, or threatened species or their habitats. Require assessments of biological resources prior to approval of any development in or within 300 feet of ecologically sensitive areas.</p>
				4-P-5	<p>Support wetland mitigation and oak woodlands restoration in the unincorporated areas outside the UGB.</p>
				Table	<p>Table 4.1-1: Special Status Species Known to Occur or</p>

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						Potentially Occurring within the Petaluma Planning Area.
3.8-2	<i>Implementation of the proposed General Plan could result in substantial adverse effects on California Brackishwater Snail or its habitat.</i>	NA		Less than Significant		
3.8-3	<i>Implementation of the proposed General Plan could result in substantial adverse effects on the salt marsh harvest mouse or its habitat.</i>		Policies 4-P-3, 4-P-4, and 4-P-5 (see Impact 3.8-1).	Less than Significant		See impact 3.8-1 and related policies and programs.
3.8-4	<i>Implementation of the proposed General Plan could result in substantial adverse effects on special status bat species or their habitat.</i>		Policies 4-P-3, 4-P-4, and 4-P-5 (see Impact 3.8-1).	Less than Significant		See impact 3.8-1 and related policies and programs.
3.8-5	<i>Implementation of the proposed General Plan could result in substantial adverse effects</i>		Policies 4-P-3, 4-P-4, and 4-P-5 (see Impact 3.8-1).	Less than Significant		See impact 3.8-1 and related policies and programs.

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	<i>on American badger or its habitat.</i>					
3.8-6	<i>Implementation of the proposed General Plan could result in substantial adverse effects on western pond turtle, California tiger salamander, foothill yellow-legged frog, California red-legged frog, or their habitat.</i>		Policies 4-P-3, 4-P-4, and 4-P-5 (see Impact 3.8-1).	Less than Significant		See impact 3.8-1 and related policies and programs.
3.8-7	<i>Implementation of the proposed General Plan could result in substantial adverse effects on nesting raptor species or their habitat.</i>		Policies 4-P-1, 4-P-3, 4-P-4, and 4-P-5 (see Impact 3.8-1).	Less than Significant		See impact 3.8-1 and related policies and programs.
		4-P-6	Improve air quality through required planting of trees along streets and within park and urban separators, and retaining tree and plant resources along the river and creek corridors. A. Require planting of trees at a ratio of five (24" box or larger) for every significant tree removed at a project site. Replacement planting may occur on the project site or on a publicly owned area, with long-term maintenance assured.		4-P-6	Improve air quality through required planting of trees along streets and within park and urban separators, and retaining tree and plant resources along the river and creek corridors. A. Require planting of trees for every significant tree removed at a project site. Replacement planting may occur on the project site or on a publicly owned area, with long-term maintenance assured. ● Encourage the use of trees which provide biogenic benefits to air quality and are suitable to the local

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					environment. <ul style="list-style-type: none"> • Establish ratio and size of replacement trees as part of the development code update.
3.8-8	<i>Implementation of the proposed General Plan could result in substantial adverse effects on California black rail bird, San Pablo song sparrow, Saltmarsh common yellow throat or other special status bird species.</i>		Policies 4-P-1, 4-P-3, 4-P-4, 4-P-5, and 4-P-6 (see Impact 3.8-7).	Less than Significant	See impact 3.8-7 and related policies and programs.
3.8-9	<i>Implementation of the proposed General Plan could result in substantial adverse effects on oak woodland and special status plant species or their habitat.</i>		Policies 4-P-1, 4-P-3, 4-P-4, 4-P-5, and 4-P-6 (see Impact 3.8-7).	Less than Significant	See impact 3.8-7 and related policies and programs.
3.8-10	<i>Implementation of the General Plan could adversely affect riparian areas, wetlands and/or</i>		Policies 4-P-1, 4-P-3, 4-P-4, and 4-P-5 (see Impact 3.8-1).	Less than Significant	See impact 3.8-1 and related policies and programs.

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	<i>“other waters of the United States.”</i>					
3.8-11	<i>Implementation of the proposed General Plan would not interfere with the movement of fish or wildlife species.</i>	NA		Less than Significant	4-P-1	See impact 3.8-1, policy 4.P-1 and related programs.
3.8-12	<i>Implementation of the proposed General Plan may conflict with the provisions of the Draft Santa Rosa Plain Conservation Strategy.</i>	NA		Less than Significant		
3.9-1	<i>At buildout, implementation of the proposed General Plan would generate increased local traffic volumes in the Planning Area that would result in a substantial increase to existing exterior noise levels that are currently</i>	10-P-6	Continue efforts to incorporate noise considerations into land use planning decisions, and guide the location and design of transportation facilities to minimize the effects of noise on adjacent land uses.	Less than Significant	10-P-7	Continue efforts to incorporate noise considerations into land use planning decisions, and guide the location and design of transportation facilities to minimize the effects of noise on adjacent land uses.

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	<i>above the City standards.</i>					
		10-P-7	Discourage location of new noise-sensitive uses, primarily homes, in areas with projected noise levels greater than 65 dB CNEL. Where such uses are permitted, require incorporation of mitigation measures to ensure that interior noise levels do not exceed 45 dB CNEL.		10-P-8	Discourage location of new noise-sensitive uses, primarily homes, in areas with projected noise levels greater than 65 dB CNEL. Where such uses are permitted, require incorporation of mitigation measures to ensure that interior noise levels do not exceed 45 dB CNEL.
		10-P-9	Continue to require control of noise or mitigation measures for any noise-emitting construction equipment or activity. <i>The City's Noise Ordinance establishes controls on construction-related noise.</i>		10-P-10	Continue to require control of noise or mitigation measures for any noise-emitting construction equipment or activity. <i>The City's Noise Ordinance establishes controls on construction-related noise.</i>
		10-P-10	As part of development review, use [General Plan] Figure 10-2: Land Use Compatibility Standards to determine acceptable uses and installation requirements in noise-impacted areas.		10-P-11	As part of development review, use [General Plan] Figure 10-2: Land Use Compatibility Standards to determine acceptable uses and installation requirements in noise-impacted areas.
		10-P-11	NWPRA corridor, without findings that such walls will not be detrimental to community character. When sound walls are deemed necessary integrate them into the streetscape, whenever possible.		10-P-12	NWPRA corridor, without findings that such walls will not be detrimental to community character. When sound walls are deemed necessary integrate them into the streetscape, whenever possible.
		10-P-12	In making a determination of impact under the California Environmental Quality Act (CEQA), consider an increase of four or more dBA to be "significant" if the resulting noise level would exceed that described as normally acceptable for the affected land use in General Plan Figure 10-3: Land Use Compatibility for Community Noise Environments.		10-P-13	In making a determination of impact under the California Environmental Quality Act (CEQA), consider an increase of four or more dBA to be "significant" if the resulting noise level would exceed that described as normally acceptable for the affected land use in General Plan Figure 10-3: Land Use Compatibility for Community Noise Environments.
3.9-2	<i>Implementation of the proposed General Plan would add new stationary sources of noise, but would not exceed the City</i>		Policies 10-P-7 and 10-P-12 (see Impact 3.9-1).	Less than Significant		See Impact 3.9-1, policies 10-P-8 and 10-P-13.

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	<i>noise standards.</i>					
		10-P-8	<p>Ensure that the City's Noise Ordinance and other regulations:</p> <ul style="list-style-type: none"> • Require that applicants for new noise-sensitive development in areas subject to noise levels greater than 65 dB CNEL obtain the services of a professional acoustical engineer to provide a technical analysis and design of mitigation measures. • Require placement of fixed equipment, such as air conditioning units and condensers, inside or in the walls of new buildings or on roof-tops of central units in order to reduce noise impacts on any nearby sensitive receptors. • Establish appropriate noise-emission standards to be used in connection with the purchase, use, and maintenance of City vehicles. 		10-P-9	<p>Ensure that the City's Noise Ordinance and other regulations:</p> <ul style="list-style-type: none"> • Require that applicants for new noise-sensitive development in areas subject to noise levels greater than 65 dB CNEL obtain the services of a professional acoustical engineer to provide a technical analysis and design of mitigation measures. • Require placement of fixed equipment, such as air conditioning units and condensers, inside or in the walls of new buildings or on roof-tops of central units in order to reduce noise impacts on any nearby sensitive receptors. • Establish appropriate noise-emission standards to be used in connection with the purchase, use, and maintenance of City vehicles.
3.9-3	<i>Construction activities associated with implementation of the proposed General Plan would generate and expose persons nearby to excessive groundborne vibration or groundborne noise levels.</i>		Policy 10-P-9 (see Impact 3.9-1).	Less than Significant		See Impact 3.9-1, policy 10-P-10.
3.9-4	<i>Construction activities</i>		Policy 10-P-9 (see Impact 3.9-1).	Less than		See Impact 3.9-1, policy 10-P-10.

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	<i>associated with implementation of the proposed General Plan could generate noise levels that exceed the City standards.</i>			Significant		
		<p>Although not required to avoid a significant impact, the following mitigation measure would further reduce noise levels. Mitigation Measure</p> <p>3.9(a) Project developers shall require by contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:</p> <ul style="list-style-type: none"> • Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period; • Ensure that construction equipment is properly muffled according to industry standards; • Place noise-generating construction equipment and locate construction staging areas away from residences, where feasible; • Schedule high noise-producing activities between the hours of 8 a.m. and 5 p.m. to minimize disruption on sensitive uses; and • Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, noise barriers or noise blankets. 			4-P-16	<p>To reduce combustion emissions during construction and demolition phases, the contractor of future individual projects should include in construction contracts the following requirements or measures shown to be equally effective:</p> <ul style="list-style-type: none"> • Maintain construction equipment engines in good condition and in proper tune per manufacturer's specification for the duration of construction; • Minimize idling time of construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment; • Use alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline); • Use add-on control devices such as diesel oxidation catalysts or particulate filters; • Use diesel equipment that meets the ARB's 000 or newer certification standard for off-road heavy-duty diesel engines; • Phase construction of the project; • Limit the hours of operation of heavy duty equipment.
3.10-1	<i>Buildout of the proposed General Plan</i>	4-P-8	<p>Reduce motor vehicle related air pollution.</p> <p>A. Enforce land use and transportation strategies described in Chapter 2: Land Use</p>	Significant and	4-P-7	<p>Reduce motor vehicle related air pollution.</p> <p>A. Enforce land use and transportation strategies described in Chapter 1: Land Use and Chapter 5: Mobility that</p>

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	<i>would result in population levels that could conflict with the Bay Area 2005 Ozone Strategy.</i>		and Chapter 5: Mobility that promote use of alternatives to the automobile for transportation, including walking, bicycling, bus transit, and carpooling.	Un-avoidable	<p>promote use of alternatives to the automobile for transportation, including walking, bicycling, bus transit, and carpooling.</p> <p><i>Motor vehicles, regulations of whose emissions by local agencies is preempted by State law, are the major source of criteria air pollutants in the Bay Area Air Basin, accounting for the vast majority of carbon monoxide and particulate matter and over a quarter of the reactive oxygen gas and nitrogen dioxide in the region. Increased use of transit and carpooling, coupled with land use and circulation patterns that promote walking and bicycling, can lead to a decrease in daily trips, less emissions, and improved air quality.</i></p>
					4-P-8 Support, where feasible, the development of alternative fuel stations.
					4-P-9 Require a percentage of parking spaces in large parking lots or garages to provide electrical vehicle charging facilities.
					4-P-10 Require electric vehicle charging and alternative fuel facilities at all new and remodeled gas stations.
					4-P-11 Promote ride-sharing and car-sharing programs.
					4-P-12 Prohibit new and significant expansion of existing drive-thru food and service facilities.
					4-P-14 Require development of traffic roundabouts, where feasible, as an alternative to a traffic signal, to reduce idling vehicles.
					4-P-15 Develop and integrate Intelligent Transportation Technologies, as applicable, into Petaluma's transportation system.
		4-P-11	Improve air quality by reducing emissions from stationary point sources of air pollution (e.g. equipment at commercial and industrial facilities)		4-P-16 Improve air quality by reducing emissions from stationary point sources of air pollution (e.g. equipment at commercial and industrial facilities) and stationary area sources (e.g. wood-

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

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	<p>and stationary area sources (e.g. wood-burning fireplaces & gas powered lawnmowers) which cumulatively emit large quantities of emissions.</p> <p>A. Work with the Bay Area Air Quality Management District to achieve emissions reductions for non attainment pollutants; including carbon monoxide, ozone, and PM-10, by implementation of air pollution control measures as required by State and federal statutes.</p> <p>B. The BAAQMD's CEQA Guidelines should be used as the foundation for the City's review of air quality impacts under CEQA.</p> <p>C. Use Petaluma's development review process and the California Environmental Quality Act (CEQA) regulations to evaluate and mitigate the local and cumulative effects of new development on air quality.</p> <p>D. Require development projects to abide by the standard construction dust abatement measures included in BAAQMD's CEQA Guidelines. These measures would reduce exhaust and particulate emissions from construction and grading activities.</p> <p>E. Reduce emissions from residential and commercial uses by requiring the following:</p> <ul style="list-style-type: none"> • Use of high efficiency heating and other appliances, such as cooking equipment, refrigerators, and furnaces, and low NOx water heaters in new and existing residential units. Require the Building Division to maintain standards for these; • Compliance with or exceed 		<p>burning fireplaces & gas powered lawnmowers) which cumulatively emit large quantities of emissions.</p> <p>A. Continue to work with the Bay Area Air Quality Management District to achieve emissions reductions for non attainment pollutants; including carbon monoxide, ozone, and PM-10, by implementation of air pollution control measures as required by State and federal statutes. <i>The BAAQMD's CEQA Guidelines should be used as the foundation for the City's review of air quality impacts under CEQA.</i></p> <p>B. Continue to use Petaluma's development review process and the California Environmental Quality Act (CEQA) regulations to evaluate and mitigate the local and cumulative effects of new development on air quality.</p> <p>C. Continue to require development projects to abide by the standard construction dust abatement measures included in BAAQMD's CEQA Guidelines. <i>These measures would reduce exhaust and particulate emissions from construction and grading activities.</i></p> <p>D. Reduce emissions from residential and commercial uses by requiring the following:</p> <ul style="list-style-type: none"> • Use of high efficiency heating and other appliances, such as cooking equipment, refrigerators, and furnaces, and low NOx water heaters in new and existing residential units; • Compliance with or exceed requirements of CCR Title 4 for new residential and commercial buildings; • Incorporation of passive solar building design and landscaping conducive to passive solar energy use for both residential and commercial uses, i.e., building orientation in a south to southeast direction, encourage planting of deciduous trees on west

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	<p>requirements of CCR Title 24 for new residential and commercial buildings;</p> <ul style="list-style-type: none"> • Incorporation of passive solar building design and landscaping conducive to passive solar energy use for both residential and commercial uses, i.e., building orientation in a south to southeast direction, encourage planting of deciduous trees on west sides of structures, landscaping with drought resistant species, and use of groundcovers rather than pavement to reduce heat reflection; • Use of battery-powered, electric, or other similar equipment that does not impact local air quality for non-residential maintenance activities; • Provide natural gas hookups to fireplaces or require residential use of EPA-certified wood stoves, pellet stoves, or fireplace inserts. <p><i>Current building code standards generally ban the installation of open-hearth, wood-burning fireplaces and wood stoves in new construction. It does, however, allow for the use of low-polluting wood stoves and inserts in fireplaces approved by the federal Environmental Protection Agency, as well as fireplaces fueled by natural gas.</i></p>		<p>sides of structures, landscaping with drought resistant species, and use of groundcovers rather than pavement to reduce heat reflection;</p> <ul style="list-style-type: none"> • Use of battery-powered, electric, or other similar equipment that does not impact local air quality for non-residential maintenance activities; • Provide natural gas hookups to fireplaces or require residential use of EPA-certified wood stoves, pellet stoves, or fireplace inserts. <p><i>Current building code standards generally ban the installation of open-hearth, wood-burning fireplaces and wood stoves in new construction. It does, however, allow for the use of low-polluting wood stoves and inserts in fireplaces approved by the federal Environmental Protection Agency, as well as fireplaces fueled by natural gas.</i></p>
			<p>4-P-17</p> <p>To avoid potential health effects and citizen complaints that may be caused by sources of odors, dust from agricultural uses, or toxic air contaminants the following measures may be considered:</p> <ul style="list-style-type: none"> • Locate new stationary sources of air pollutants, such as industrial facilities, at sufficient distances away from residential areas and facilities that serve sensitive receptors to avoid significant impacts caused by odors,

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			<p>dust, and toxic air contaminants.</p> <ul style="list-style-type: none"> • Include buffer zones within new residential and sensitive receptor site plans to separate those uses from potential sources of odors, dust from agricultural uses, and stationary sources of toxic air contaminants.
	<p>5-P-13 Encourage existing major employers to develop and implement Transportation Demand Management programs to reduce peak-period trip generation.</p> <ul style="list-style-type: none"> A. Study the feasibility of a citywide TDM program that would be funded by annual fees or assessments on new development. B. Assign a proportion of TDM fees to Petaluma Transit for expansion of service and future fare reductions or fare elimination. C. As part of the development code, require TDM measures for all new non-residential development. D. Assign trip reduction credits and reduced transportation impact fees for demonstrated commitment to TDM strategies. E. Reduce parking requirements for mixed-use developments and for developments providing shared parking or a TDM program. F. Establish a TDM program for City of Petaluma employees. G. Collaborate with Santa Rosa Junior College to minimize the impact of future enrollment growth on local traffic and parking demand, such as though TDM measures, limitations on parking near the 		<p>5-P-13 Encourage existing major employers to develop and implement Transportation Demand Management programs to reduce peak-period trip generation.</p> <ul style="list-style-type: none"> A. Study the feasibility of a citywide TDM program that would be funded by annual fees or assessments on new development. B. If developed, assign a proportion of TDM fees to Petaluma Transit for expansion of service and future fare reductions or fare elimination. C. Assign trip reduction credits and reduced transportation impact fees for demonstrated commitment to TDM strategies. D. Reduce parking requirements for mixed-use developments and for developments providing shared parking or a TDM program. E. Consider establishing a TDM program for City of Petaluma employees. F. Continue to collaborate with Santa Rosa Junior College to minimize the impact of future enrollment growth on local traffic and parking demand, such as through TDM measures, limitations on parking near the College and on-campus parking management. G. Encourage provision of preferential parking in selected areas for designate carpools, motorcycles, bikes and alternative fuel vehicles. <p>NOTE: While adoption of the Trip Reduction Ordinance is identified as a potential mitigation to help decrease levels of traffic, through voluntary participation, the Ordinance itself is not relied on to mitigate the conditions to "less than significant"</p>

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			College and on-campus parking management. H. Encourage provision of preferential parking in selected areas for designated carpools.		levels at any of the failing intersections, since those intersections have been identified as having significant and unavoidable impacts.
					4-P-23 Fund and/or designate a Green Program Manager to oversee implementation of all Greenhouse Gas Emissions policies and programs identified in the Greenhouse Gas Emissions section as well as the City's Climate Action Plan. The policies and programs will need to be reviewed and updated periodically as new information, regulatory standards, and technologies develop. A report shall be provided to the City Council biannually, reporting on the status of the City's efforts to reduce green house gases, and recommendations for any changes that are deemed necessary.
					4-P-24 Comply with AB 32 and its governing regulations to the full extent of the City's jurisdictional authority.
					4-P-25 To the full extent of the City's jurisdictional authority, implement any additional adopted State legislative or regulatory standards, policies and practices designed to reduce greenhouse gas emissions, as those measures are developed.
					4-P-26 Implement all measures identified in the municipal Climate Action Plan to meet the municipal target set in Resolution 2005-118 (20% below 2000 levels by 2010).
					4-P-27 The City shall prepare a Community Climate Action Plan to identify and prioritize programs, projects, and procedural policies that will help the City achieve the community greenhouse gas emission goals of Resolution 2005-118 (25% below 1990 levels by 2015).
					4-P-28 Prepare a feasibility report for the City of Petaluma forming a Community Choice Aggregation (through AB 117, permits any city or county to aggregate the electric loads of residents,

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					businesses and municipal facilities to facilitate the purchase and sale of electrical energy) as a way of supplying renewable energy to the community.
				4-P-29	Train appropriate City staff on new technology and look for opportunities to improve energy efficiency in public facilities.
				4-P-30	Continue to monitor new technology and innovative sustainable design practices for applicability to insure future development minimizes or eliminates the use of fossil fuel and GHG-emitting energy consumption.
				4-P-31	Provide information and tips on reducing greenhouse gas emissions to the community. A. Advertise "Green Tip" in the local newspaper. B. Work with utilities to offer Green Tips with the utility bills. C. Continue sponsoring Petaluma's green programs, including, but not limited to, the Going Green Expo. D. Create a program of on-going community education. E. Support the efforts of the Sonoma Green Business Program.
				4-P-32	Develop and implement a municipal Environmentally Preferable Purchasing Program.
3.10-2	<i>Implementation of the proposed General Plan may contribute substantially to an existing air quality violation.</i>		Policies 4-P-8 and 4-P-11 (see Impact 3.10-1).	Less than Significant	See Impact 3.10-1 and related policies and programs.
		4-P-12	To reduce combustion emissions during construction and demolition phases, the contractor of future individual projects shall include in construction contracts the following requirements		4-P-16 To reduce combustion emissions during construction and demolition phases, the contractor of future individual projects should include in construction contracts the following

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		<p>or measures shown to be equally effective:</p> <ul style="list-style-type: none"> • Maintain construction equipment engines in good condition and in proper tune per manufacturer's specification for the duration of construction; • Minimize idling time of construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment; • Use alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline); • Use add-on control devices such as diesel oxidation catalysts or particulate filters; • Use diesel equipment that meets the ARB's 2000 or newer certification standard for off-road heavy-duty diesel engines; • Phase construction of the project; • Limit the hours of operation of heavy duty equipment. 		<p>requirements or measures shown to be equally effective:</p> <ul style="list-style-type: none"> • Maintain construction equipment engines in good condition and in proper tune per manufacturer's specification for the duration of construction; • Minimize idling time of construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment; • Use alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline); • Use add-on control devices such as diesel oxidation catalysts or particulate filters; • Use diesel equipment that meets the ARB's 000 or newer certification standard for off-road heavy-duty diesel engines; • Phase construction of the project; • Limit the hours of operation of heavy duty equipment.
				<p>4-P-17</p> <p>To avoid potential health effects and citizen complaints that may be caused by sources of odors, dust from agricultural uses, or toxic air contaminants the following measures may be considered:</p> <ul style="list-style-type: none"> • Locate new stationary sources of air pollutants, such as industrial facilities, at sufficient distances away from residential areas and facilities that serve sensitive receptors to avoid significant impacts caused by odors, dust, and toxic air contaminants. • Include buffer zones within new residential and sensitive receptor site plans to separate those uses from potential

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						sources of odors, dust from agricultural uses, and stationary sources of toxic air contaminants.
3.10-3	<i>Implementation of the proposed General Plan may result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable national or State ambient air quality standard.</i>	NA		Less than Significant		See Impacts 3.10-1 and 3.10-2 and related policies and programs.
3.10-4	<i>CO emissions associated with buildout of the proposed project may result in exposure of sensitive receptors to CO emissions.</i>		Policy 4-P-8 (see Impact 3.10-1).	Less than Significant		See Impacts 3.10-1 and 3.10-2 and related policies and programs.
3.10-5	<i>Development and occupation of the proposed General Plan could result in placement of sensitive land uses near potential sources</i>		See Impact 3.10-1	Less than Significant		See Policy 3-P-17 under Impact 3.10-1.

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	<i>of objectionable odors, dust, or toxic air contaminants.</i>					
3.10-6	<i>Implementation of the proposed GP may result in a cumulatively considerable incremental contribution to the significant cumulative impact of Global Climate Change</i>		See Table A-1 in Revised Draft EIR – Air Quality, Greenhouse Gas Emissions for revisions to Policies and Programs included within Final EIR and General Plan 2025.	Significant and Unavoidable	4-P-23	Fund and/or designate a Green Program Manager to oversee implementation of all Greenhouse Gas Emissions policies and programs identified in the Greenhouse Gas Emissions section as well as the City's Climate Action Plan. The policies and programs will need to be reviewed and updated periodically as new information, regulatory standards, and technologies develop. A report shall be provided to the City Council biannually, reporting on the status of the City's efforts to reduce greenhouse gases, and recommendations for any changes that are deemed necessary.
					4-P-24	Comply with AB 32 and its governing regulations to the full extent of the City's jurisdictional authority.
					4-P-25	To the full extent of the City's jurisdictional authority, implement any additional adopted State legislative or regulatory standards, policies and practices designed to reduce greenhouse gas emissions, as those measures are developed.
					4-P-26	Implement all measures identified in the municipal Climate Action Plan to meet the municipal target set in Resolution 2005-118 (20% below 2000 levels by 2010).
					4-P-27	The City shall prepare a Community Climate Action Plan to identify and prioritize programs, projects, and procedural policies that will help the City achieve the community greenhouse gas emission goals of Resolution 2005-118 (25% below 1990 levels by 2015).
					4-P-28	Prepare a feasibility report for the City of Petaluma forming a Community Choice Aggregation (through AB 117, permits any city or county to aggregate the electric loads of residents, businesses and municipal facilities to facilitate the purchase and sale of electrical energy) as a way of supplying renewable energy to the community.

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					4-P-29	Train appropriate City staff on new technology and look for opportunities to improve energy efficiency in public facilities.
					4-P-30	Continue to monitor new technology and innovative sustainable design practices for applicability to insure future development minimizes or eliminates the use of fossil fuel and GHG-emitting energy consumption.
					4-P-31	Provide information and tips on reducing greenhouse gas emissions to the community. A. Advertise "Green Tip" in the local newspaper. B. Work with utilities to offer Green Tips with the utility bills. C. Continue sponsoring Petaluma's green programs, including, but not limited to, the Going Green Expo. D. Create a program of on-going community education. E. Support the efforts of the Sonoma Green Business Program.
					4-P-32	Develop and implement a municipal Environmentally Preferable Purchasing Program
3.11-1	<i>New development may block views of Sonoma Mountain and ridgelines and/or alter the visual character of the hillsides.</i>	2-P-14	Allow development in hillside areas that preserve ridgelines and are site sensitive. A. Establish development and design standards related to residential development in hillside areas that address: <ul style="list-style-type: none"> • Location of hillside residential units, including preserving ridgelines. • Clustering provisions to preserve open space, natural assets (woodlands, creeks, etc.). • Building development and design in a clustered format, including standards for building height and massing. • Provisions for clustered development, including amount of bonus, alternate development forms, common recreational facilities, phasing, etc. A. Enhance the hillside development regulations	Less than Significant	1-P-15	Allow development in hillside areas that preserve ridgelines and are site sensitive. A. Establish development and design standards related to residential development in hillside areas that address: <ul style="list-style-type: none"> • Location of hillside residential units, including preserving ridgelines. • Specific provisions to preserve open space, natural assets (woodlands, creeks, etc.). • Standards for building height and massing. • Appropriate forms of clustered development, including amount of bonus, alternate development forms, common recreational facilities, phasing, etc. B. Enhance the hillside development regulations in the Development Code to include: <ul style="list-style-type: none"> • Regulating development density by degree of hillside slope.

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			<p>in the Development Code to include:</p> <ul style="list-style-type: none"> Regulating development density by degree of hillside slope. Protecting unique natural features, including landforms, mature trees, and ridge lines, by requiring location of structures away from these assets. Encouraging architectural design that reflects the natural form of the hillside setting, in order to minimize visual and environmental impacts. Preventing the significant alteration of hillside topography through grading and paving. Use of visually unobtrusive building materials. 		<ul style="list-style-type: none"> Protecting unique natural features, including landforms, mature trees and their surrounding habitat, and ridge lines, by requiring location of structures away from these assets. Requiring architectural design that reflects the natural form of the hillside setting, in order to minimize visual and environmental impacts. Preventing the significant alteration of hillside topography through grading and paving. Use of visually unobtrusive building materials.
		2-P-15	Retain ridgelines and prominent hillsides as open space through clustering and transfer of density to other parts of a development site (applies to Rural and Very Low Residential areas within the West Hills, South Hills and Petaluma Boulevard North subareas only).		1-P-16 Retain ridgelines and prominent hillsides as open space through appropriate clustering and/or transfer of density to other parts of a development site (applies to Rural and Very Low Residential areas within the West Hills, South Hills and Petaluma Boulevard North subareas only).
					2-P-8 Require single-loaded streets along the Urban Separator and riparian corridors to ensure the creation of linear open space corridors with maximum public accessibility, visibility, and opportunities for stewardship.
					2-P-65 Require dedication of the Urban Separator along the western and southern boundaries of the UGB.
		3-P-63	<p>Extend the Urban Separator.</p> <ul style="list-style-type: none"> To the extent feasible, provide an area up to 300-feet in width along the eastern boundary of the South Hills subarea by requiring dedication of land as Urban Separator, while allowing density transfers from the Urban Separator to 		2-P-69 <p>Extend the Urban Separator.</p> <ul style="list-style-type: none"> To the extent feasible, provide an area up to 300-feet in width along the eastern boundary of the South Hills subarea by requiring dedication of land as Urban Separator, while allowing density transfers from the Urban Separator to the developable portion of individual sites.

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			<p>the developable portion of individual sites.</p> <ul style="list-style-type: none"> • Develop a strong gateway at I Street with landscape treatment and views of the Petaluma Valley. • Preserve the existing public viewsheds featuring the Petaluma community. 		
				2-P-70	Develop a strong gateway at I Street with landscape treatment and views of the Petaluma Valley. Maintain the rural character and interface of the adjacent outlying areas of the UGB when designing gateway improvements.
				2-P-71	Preserve the existing public viewsheds featuring the Petaluma community.
		10-P-3	<p>Regulate the grading and development of hillside areas for new urban land uses, by instituting a Hillside Overlay or other similar mechanism in the Development Code. Ensure that new development on hillsides is constructed to reduce erosion and landslide hazards:</p> <ul style="list-style-type: none"> • Limit cut slopes to 3:1, except where an engineering geologist can establish that a steeper slope would perform satisfactorily over the long term. • Encourage use of retaining walls or rock-filled crib walls as an alternative to high cut slopes. • Ensure revegetation of cut-and-fill slopes to control erosion. Plant materials for revegetation should not be limited to hydro-seeding and mulching with annual grasses. Trees add structure to the soil and take up moisture while adding color and diversity. 	10-P-3	<p>Regulate the grading and development of hillside areas for new urban land uses, by instituting a Hillside Overlay or other similar mechanism in the Development Code. Ensure that new development on hillsides is constructed to reduce erosion and landslide hazards and in compliance with any City hillside regulations, including, but not limited to:</p> <ul style="list-style-type: none"> • Limit cut slopes to 3:1, except where an engineering geologist can establish that a steeper slope would perform satisfactorily over the long term. • Encourage use of retaining walls or rock-filled crib walls as an alternative to high cut slopes. • Ensure revegetation of cut-and-fill slopes to control erosion. Plant materials for revegetation should not be limited to hydro-seeding and mulching with annual grasses. Trees add structure to the soil and take up moisture while adding color and diversity. • Ensure blending of cut-and-fill slopes within existing contours, and provision of horizontal variation, in order to

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			<ul style="list-style-type: none"> • Ensure blending of cut-and-fill slopes within existing contours, and provision of horizontal variation, in order to mitigate the artificial appearance of engineered slopes. • Ensure structural integrity of sites previously filled before approving redevelopment. 			<p>mitigate the artificial appearance of engineered slopes.</p> <ul style="list-style-type: none"> • Ensure structural integrity of sites previously filled before approving redevelopment. <p>See also Chapter 1: Land Use, Growth Management, and the Built Environment and Chapter 3: Community Design Character and Green Building for additional hillside policies and programs.</p>
3.11-2	<i>New development and intensification along the Petaluma River could adversely affect the visual character of this natural resource.</i>	2-P-36	An area shown as the Petaluma River Corridor (PRC), along the Petaluma River, shall be set aside for the creation of flood terraces where appropriate, preservation, expansion, and maintenance of flood storage capacity of the floodplain, habitat conservation, and public access.	Less than Significant	1-P-39	An area shown as the Petaluma River Corridor (PRC), along the Petaluma River, shall be set aside for the creation of flood terraces where appropriate, preservation, expansion, and maintenance of flood storage capacity of the floodplain, habitat conservation, and public access.
		3-P-37	<p>The Petaluma River Corridor (PRC) shall be dedicated to the City, improved and maintained in perpetuity by the development as adjacent development occurs.</p> <p>A. Design Standards shall be developed for the Petaluma River Corridor.</p> <p>B. Maintenance of the PRC shall be assured through the creation of a funding mechanism such as citywide surface water utility fee or Landscape Assessment District.</p> <p>C. All development within the PRC shall be subject to a discretionary review process.</p>		1-P-40	<p>The Petaluma River Corridor (PRC) shall be irrevocably offered for dedication to the City, improved and maintained in perpetuity by the development as adjacent development occurs.</p> <p>A. Design Standards shall be developed for the Petaluma River Corridor.</p> <p>B. Maintenance of the PRC, not covered by maintenance in perpetuity by adjacent development, may be assured through the creation of a funding mechanism such as citywide surface water utility fee or Landscape Assessment District.</p>
					1-P-41	All development on lands affected by the PRC designation shall be subject to a discretionary review process beyond that required by CEQA.
		2-P-38	Development shall incorporate the River as a major design focal point, orienting buildings and		1-P-42	Development shall incorporate the River as a major design focal point, orienting buildings and activities toward the River and

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		activities toward the River.			providing water access, to the extent deemed environmentally responsible.
	2-P-39	Develop the Petaluma River as a publicly-accessible green ribbon, fronted by streets, paths, and open spaces, by implementing the Petaluma River Access and Enhancement Plan within the context of the PRC Design Standards.		1-P-43	Develop the Petaluma River as a publicly-accessible green ribbon, fronted by streets, paths, access points, and open spaces, by implementing the Petaluma River Access and Enhancement Plan within the context of the PRC Design Standards.
	3-P-28	Foster connections to the river from surrounding areas and ensure that new development adjacent to the river is oriented toward it.		2-P-33	Foster connections to the river from surrounding areas and ensure that new development adjacent to the river is oriented toward it.
				1-P-44	Development along the River shall include the creation and maintenance, in perpetuity, of public access sites. Amenities provided may include ramps, steps, docks or other means of access to the water.
				1-P-45	New development shall acknowledge, preserve, protect, and enhance the ecological and biological health and diversity of the Petaluma River.
	3-P-32	Promote greater accessibility to the Petaluma River and vacant lands through road extensions, bikeways, and trails, including: <ul style="list-style-type: none"> • Extending Burlington Drive northward across Lynch Creek, and consider other options to extend streets through to new developments. • Requiring new development to be oriented to the river, and providing continuous public access to the riverfront. 		2-P-37	Promote greater accessibility to the Petaluma River and vacant lands through road extensions, bikeways, and trails, including: <ul style="list-style-type: none"> • Extending Burlington Drive northward across Lynch Creek, and consider other options to extend streets through to new developments. • Requiring new development to be oriented to the river, and providing continuous public access to the riverfront.
	3-P-35	Provide gateway improvements both east and west of the Highway 101 overcrossing of the Petaluma River. <p>A. East of Highway 101, undertake a streetscape improvement program that incorporates new</p>		2-P-40	Provide gateway improvements both east and west of the Highway 101 overcrossing. <p>A. East of Highway 101, undertake a streetscape improvement program that recognizes existing trees, incorporates new trees and vegetation, while reinforcing a</p>

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			<p>trees and vegetation, while maintaining a visual and physical connection to the Petaluma River.</p> <p>B. Preserve and expand river-dependent industrial uses, while improving appearance and screening from Petaluma Boulevard South.</p> <p>C. Develop the terminus of the Caulfield Lane “southern crossing” with Petaluma Boulevard South as an emphatic gateway, with methods—such as a roundabout and more defined lane widths—to slow traffic and define entrance into the community and new neighborhoods.</p>		<p>visual and physical connection to the Petaluma River and estuary.</p> <p>B. Preserve and expand river-dependent industrial uses, while improving appearance from Petaluma Boulevard South with landscaping.</p> <p>C. Develop the terminus of the Caulfield Lane “southern crossing” with Petaluma Boulevard South as a gateway, with methods—such as a roundabout, tree-lined median, reduced lane widths, or other traffic calming/design treatments—to slow traffic and define an entrance into the community and new neighborhoods.</p> <p>D. With or without the southern crossing develop traffic calming measures to address traffic speeds.</p>
		3-P-36	Provide vistas eastward to the Petaluma River and across toward Sonoma Mountain.		2-P-41 Provide vistas eastward to the Petaluma River and across toward Sonoma Mountain.
		3-P-50	Develop the Petaluma River as a publicly-accessible green ribbon, fronted by streets, paths, and open spaces, by implementing the Natural Environment and Water Resources elements and the Petaluma River Access and Enhancement Plan.		1-P-43 Develop the Petaluma River as a publicly-accessible green ribbon, fronted by streets, paths, access points, and open spaces, by implementing the Petaluma River Access and Enhancement Plan within the context of the PRC Design Standards.
		3-P-51	Foster connections to the river from surrounding areas and ensure that new development adjacent to the river is oriented toward it.		2-P-33 and 2-P-56 Foster connections to the river from surrounding areas and ensure that new development adjacent to the river is oriented toward it.
		3-P-52	Use the Petaluma River Access and Enhancement Plan as the tool to implement the Petaluma River Corridor by maintaining setbacks, creating flood terraces where appropriate, and preserving floodplain and habitat conservation areas and other open spaces along the river.		2-P-58 Use the Petaluma River Access and Enhancement Plan as the tool to implement the Petaluma River Corridor by maintaining setbacks, creating natural flood terraces where appropriate, and enhancing floodplain and habitat conservation areas and other open spaces along the river utilizing an ecologically-based design approach.
		3-P-53	Promote greater accessibility and views to Petaluma River through road extensions,		2-P-59 Promote greater accessibility and views to Petaluma River through road extensions, bikeways, and trails, including:

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Signifi- cance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
			bikeways, and trails, including: <ul style="list-style-type: none"> • Requiring new development to be oriented to the river, and provide continuous public access parallel to the riverfront. • Extending Industrial Avenue south of Corona Road. • Requiring a new pedestrian/bicycle connection to the river east of Jessie Lane and intersecting with Petaluma Boulevard North. • Requiring a new street connection to the river at, or near, the intersection of Gossage Avenue. • Requiring paths from the area of Jessie Lane southwest toward Magnolia Avenue to link with existing neighborhoods. 			<ul style="list-style-type: none"> • Requiring new development to be oriented to the river, and provide continuous public access parallel to the riverfront. • Extending Industrial Avenue south of Corona Road. • Requiring a new pedestrian/bicycle connection to the river east of Jessie Lane and intersecting with Petaluma Boulevard North. • Requiring a new street connection to the river at, or near, the intersection of Gossage Avenue. • Requiring paths from the area of Jessie Lane southwest toward Magnolia Avenue to link with existing neighborhoods. • Enhancing the ecological diversity of the riparian corridor. • Requiring development to enhance the natural ecology along the river.
3.11-3	<i>New development and redevelopment activities may potentially degrade the existing visual quality of the city through incompatibilities with existing development in scale and/or character.</i>	2-P-3	Preserve the overall scale and character of established residential neighborhoods. <p>A. In addition to density standards, establish building intensity (floor area ratio) standards for residential development in the Diverse Low and Medium Density Residential districts, to prevent development out of scale with existing neighborhood context.</p> <p><i>Actual standards are to be developed and maintained in the City's Development Code.</i></p>	Less than Significant	1-P-3	Preserve the overall scale and character of established residential neighborhoods. <p>A. In addition to density standards, establish building intensity (floor area ratio) standards for residential development in the Diverse Low and Medium Density Residential districts, to prevent development out of scale with existing neighborhood context.</p> <p><i>Actual standards are to be developed and maintained in the City's Development Code.</i></p>
		3-P-42	Maintain the rural character to the west of this corridor [Petaluma Boulevard North, north of Shasta Avenue] by limiting density to primarily		2-P-47	[Petaluma Boulevard North, north of Cinnabar Avenue subarea] Maintain the rural character to the west of this corridor by limiting density:

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Significance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>
			Rural Residential uses west and north of Gossage Avenue, and Low Density Residential uses south.		<ul style="list-style-type: none"> To primarily Rural Residential uses west and north of Gossage Avenue. A combination of Rural and Low Density Residential uses south of Gossage Avenue. Limiting the mixed use of the KOA site to allow continuation and possible expansion of the variety of uses on the site (i.e. recreation/camping, support commercial, RV storage, outdoor recreational activities, seasonal events, etc.).
		3-P-56	Preserve the rural aspect of the area by maintaining the existing density (Rural, Very Low and Low Residential) and land use patterns. A decrease in density through minimum lot sizes within the Development Code can achieve the desired transition.		2-P-62 [West Hills subarea] Preserve the rural aspect of the area by maintaining the existing density (Rural, Very Low and Low Residential) and land use patterns. A decrease in density through minimum lot sizes within the Development Code can achieve the desired transition.
		3-P-99	Allow lot consolidation in residential areas only when finding that this will not negatively impact the existing neighborhood character.		2-P-114 [West subarea] Allow lot consolidation in residential areas only when finding that this will not negatively impact the existing neighborhood character.
		6-P-6	<p>Neighborhood parks are donated, constructed, and maintained within the developing property(ies). In addition to the donation and improvements, park impact fees shall be paid to offset costs associated with developing, upgrading, and maintaining community parks. Transfer of density from the donated park acreage may be considered where deemed appropriate by the City Council.</p> <p>A. Revise the City's Municipal Code to require dedication of neighborhood park land, and construction of associated neighborhood park improvements, in addition to the payment of park impact fees, eliminating the reimbursement component for neighborhood parks.</p> <p>B. Establish a transfer of development</p>		6-P-7 Neighborhood parks are donated, constructed, and maintained within the developing property(ies). The formation of landscape assessment districts to offset costs associated with developing, upgrading, and maintaining community parks may be imposed as a condition of development. Transfer of density within a project site from donated acreage in excess of dedication/in lieu requirements may be considered where deemed appropriate by the City Council. Park impact fees shall also be required prior to issuance of building permits in all cases where they can be legally imposed pursuant to City ordinance. A. Review and, if necessary, revise the City's Municipal Code regarding the payment of community park impact fees to maximize all opportunities for funding community and neighborhood parkland, park improvements and park operation and maintenance through the development

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Significance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
			<p>rights (TDR) program that allows project proponents on whose sites new parkland locations are designated, to transfer development rights from portions of the site dedicated as public open space/park beyond required dedication/in lieu requirements (5 acres per 1,000 residents) to the remainder of the site at a ratio of 1.5 x base land use designation on the site, subject to approval by the City Council and provided the following criteria are met:</p> <ul style="list-style-type: none"> • The resulting park area meets the minimum size and location requirements shown in Table 6.1-8 and Figure 6-1; • The park/open space is useful for recreational use, and not just leftover acreage; • The park/open space is physically and perceptually available to the community-at-large, and not internal to the development; • The resulting transfer will not unduly impact the character of the neighborhood where the development is located; and • The park/open space is not at the city's edge, adjacent to an urban separator. 			<p>entitlement process.</p> <p>B. Establish a transfer of development rights (TDR) program that allows project proponents on whose sites new neighborhood parkland locations are designated, to transfer development rights from portions of the site dedicated as public open space/park beyond required dedication/in lieu requirements (2 acres of neighborhood park per 1,000 residents) to the remainder of the site at the base land use designation on the site, subject to approval by the City Council and provided the following criteria are met:</p> <ul style="list-style-type: none"> • The resulting park area meets the minimum size and location requirements shown in Table 6.1-8 and Figure 6-1; • The park/open space is useful for recreational use, and not just leftover acreage; • The park/open space is physically and perceptually available to the community-at-large, and not internal to the development; • The resulting transfer will not unduly impact the character of the neighborhood where the development is located; and • The park/open space is not at the city's edge, adjacent to an urban separator.
3.12-1	<i>New development proposed under the General Plan has the potential</i>	3-P-7	<p>Protect significant historic and archaeological resources for the aesthetic, educational, economic, and scientific contribution they make to Petaluma's identity and quality of life.</p> <p>A. Maintain the character of the Petaluma</p>	Less than Significant	3-P-1	<p>Protect significant historic and archaeological resources for the aesthetic, educational, economic, and scientific contribution they make to Petaluma's identity and quality of life.</p> <p>A. Maintain the historical integrity of the Petaluma Historic</p>

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>	<i>Draft Proposed General Plan Policies that Reduced the Impact</i>	<i>Signifi- cance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>
<p><i>to disrupt undiscovered archaeological resources.</i></p>	<p>Historic Commercial District, which is listed on the National Register of Historic Places, by adhering to the city's Historic Commercial District Design Guidelines.</p> <p>B. Maintain the Oak Hill-Brewster Historic and "A" Street Historic districts as local architectural preservation districts.</p> <p>C. Develop floor area ratio and other design standards that relate overall building size and bulk to site area for Downtown, the Oak Hill-Brewster Historic District, and "A" Street neighborhoods.</p> <p>D. Develop historic preservation guidelines or standards for protecting historic quality structures that are not located within an existing historic district through initiating, requiring and/or encouraging formation of additional historic districts.</p> <p>E. The loss of existing and potential historic structures shall be minimized through strict enforcement of City policies requiring proposed demolition be reviewed by the Historic and Cultural Preservation Committee. All means shall be used to encourage preservation and/or adaptive reuse or restoration of structures built in 1945 or earlier (Resolution 2005-198 N.C.S. as thereafter amended).</p> <p>F. Ensure the protection of known archaeological resources in the city by requiring a records review for any development proposed in areas that are considered archaeologically sensitive for Native American and/or historic remains.</p> <p>G. In accordance with CEQA and the State Public Resources Code, require the</p>		<p>Commercial District, which is listed on the National Register of Historic Places, by adhering to the city's Historic Commercial District Design Guidelines.</p> <p>B. Maintain the historical integrity within the Oak Hill-Brewster and "A" Street Historic districts as adopted local historic districts.</p> <p>C. Develop floor area ratio and other design standards that relate overall building size and bulk to site area for Downtown, the Oak Hill-Brewster, and "A" Street Historic District neighborhoods.</p> <p>D. Conduct a comprehensive, city-wide survey of historic and cultural resources for the purpose of creating an historic resource inventory.</p> <ul style="list-style-type: none"> • Include updated surveys of existing Historic Districts as well as their adjacent areas. • Identify individual resources for designation as local, state or nationally designated landmarks. • The historic resource inventory shall be updated on a regular basis, per national standards. Inventories should be phased by prioritizing critical areas. <p>E. Develop historic preservation guidelines or standards for protecting historic quality structures that are not located within an existing historic district through initiating, requiring and/or encouraging formation of additional historic districts or expanding the boundaries of existing districts and identifying local landmarks.</p> <p>F. Pursue Certified Local Government (CLG) status through the California Office of Historic Preservation.</p> <p>G. Create a central repository for historic surveys, reports, guidelines, ordinances etc.</p> <p>H. The loss of existing and potential historic structures shall be minimized through strict enforcement of City policies requiring proposed demolition to be reviewed by the</p>

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Signifi- cance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>
			preparation of a resource mitigation plan and monitoring program by a qualified archaeologist in the event that archaeological remains are discovered.		<p>Historic and Cultural Preservation Committee. All means shall be used to encourage preservation and/or adaptive reuse or restoration of structures built in 1945 or earlier (Resolution 005-198 N.C.S. as thereafter amended).</p> <ul style="list-style-type: none"> • Reconsider defining structures/resources 45 years or older as the standard for review to be consistent with the State of California, CEQA, and the National Register criteria. <p>I. Prepare a salvage ordinance that requires an inventory of usable materials, in cases where demolition is the only alternative, prior to demolition of historic structures.</p> <p>J. Ensure the protection of known archaeological resources in the city by requiring a records review for any development proposed in areas that are considered archaeologically sensitive for Native American and/or historic remains.</p> <p>K. In accordance with CEQA and the State Public Resources Code, require the preparation of a resource mitigation plan and monitoring program by a qualified archaeologist in the event that archaeological remains are discovered.</p> <p>L. Consider the creation of an historic preservation planner on staff.</p>
					<p>3-P-5</p> <p>Recognize that historical and archaeological resources are irreplaceable and consequently their protection shall be a key consideration in the development review process.</p> <p>A. Encourage historic resource reports and similar background materials be submitted to Historic SPARC during preliminary review of projects involving historic or cultural resources in order to resolve potential conflicts between preservation and proposed development early in the planning process.</p>

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Signifi- cance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
						<p>B. Ensure that future plans, ordinances, and City programs are complimentary to the historic preservation goals and policies contained within this plan.</p> <p>C. Develop standards for historical review.</p>
3.12-2	<i>New infill development within previously built up areas in the City has the potential to impact sites of local historic importance and the overall historic setting of downtown.</i>	3-P-7	See Policy 3-P-7 above	Less than Significant		See Policies 3-P-1 and 3-P-5 above
3.13-1	<i>Buildout of the proposed General Plan could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</i>	10-P-13	Require compliance with Sonoma County's Integrated Waste Management Plan (CoIWMP) as well as the Consolidated Unified Protection Agency (CUPA) program elements.	Less than Significant	10-P-13	Require compliance with Sonoma County's Integrated Waste Management Plan (CoIWMP) as well as the Consolidated Unified Protection Agency (CUPA) program elements.
		10-P-14	Prepare and maintain an inventory of environmentally contaminated sites to educate future landowners about contamination from previous uses. Work directly with landowners in the cleanup of these sites, particularly in areas with redevelopment potential. <i>The U.S. Environmental Protection Agency (EPA)</i>		10-P-14	Prepare and maintain an inventory of environmentally contaminated sites to educate future landowners about contamination from previous uses. Work directly with landowners in the cleanup of these sites, particularly in areas with redevelopment potential. <i>The U.S. Environmental Protection Agency (EPA) in 2005 awarded the City of Petaluma two grants to address potential</i>

Table ES-5: Summary of Impacts and Proposed/Final General Plan Policies and Programs that Reduce the Impact

<i>Impact</i>		<i>Draft Proposed General Plan Policies that Reduced the Impact</i>		<i>Signifi- cance</i>	<i>Final General Plan Policies, Programs or Map Exhibits that Reduce the Impact</i>	
			<i>in 2005 awarded the City of Petaluma two grants to address potential brownfield properties within the city. In addition, the City has applied to the EPA for a revolving loan fund grant to help developers, non-profits, and the City clean up brownfield sites.</i>			<i>brownfield properties within the city. In addition, the City has applied to the EPA for a revolving loan fund grant to help developers, non-profits, and the City clean up brownfield sites.</i>
		10-P-15	Establish special zoning designations and environmental review processes that limit the location of industry, research, and business facilities using hazardous materials. Require safe distances between these sites and residential areas, groundwater recharge areas (see General Plan Chapter 8: Water Resources), and waterways.		10-P-15	Establish special zoning designations and environmental review processes that limit the location of industry, research, and business facilities using hazardous materials. Require safe distances between these sites and residential areas, groundwater recharge areas (see General Plan Chapter 8: Water Resources), and waterways.
3.13-2	<i>Buildout of the proposed General Plan could create a significant hazard to the public or the environment through reasonably foreseeable accidental release of hazardous materials into the environment.</i>	NA		Less than Significant		

Please refer to the General Plan 2025 document for many more goals, policies and programs relative to the preservation and enhancement of community assets.

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General Plan 2025

Revised Draft

Environmental Impact Report

Volume 5.A; Appendix G.1

Greenhouse Gas Emissions

ERRATUM #1

November 26, 2007

Page 3.10-35 of Revised DEIR



City of Petaluma, California
General Plan Administration
27 Howard Street
Petaluma, CA 94952

2005 (610,400 tons) (refer to Table 3.10-9).

Table 3.10-9 Summary of General Plan 2025 Greenhouse Gas Emissions

	Greenhouse Gas Emissions (tons CO ₂ e)
2005 Baseline Emissions	610,400
2025 General Plan Emissions	721,600
Reductions	
Selected General Plan Policies	<19,900>
State Actions Applicable to Petaluma	<139,100>
TOTAL	562,600

Despite the City’s best efforts to identify probable greenhouse gas reductions from State measures and General Plan policies and programs, not all the State reduction measures have been formally adopted at this time. Additionally, there is a substantial level of uncertainty about their effectiveness and how they will apply to local governments. Therefore, it cannot be determined to a reasonable degree of certainty that buildout under the General Plan will not result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change. Therefore, cumulative global climate change impacts could remain significant and unavoidable.

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Note: Figure 3.2-2 is not revised but should be correctly listed as being Figure 3.1-2 in the Table of Contents.

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TABLE 3.2-8 FREEWAY PEAK HOUR V/C RATIO AND LOS SUMMARY: FUTURE WITH PROJECT CONDITIONS

**AM Peak Hour: Freeway Peak-Hour V/C Ratio and LOS Summary
Future with Project Conditions**

Freeway Segment	Direction	Existing Conditions				Future with Project Conditions			
		Theoretical Capacity ¹	Volume	V/C	LOS	Theoretical Capacity ¹	Volume	V/C	LOS
Kastania Road to Petaluma Boulevard S.	NB	4,400	1,083	0.25	A	5,500	1,580	0.29	A
	SB	4,400	4,237	0.96	E	5,500	5,054	0.92	E
Petaluma Boulevard S. to Lakeville Highway	NB	4,400	1,135	0.26	A	5,500	1,462	0.27	A
	SB	4,400	3,361	0.76	C	5,500	4,033	0.73	C
Lakeville Highway to E. Washington Street	NB	4,400	1,721	0.39	A	5,500	2,194	0.40	A
	SB	4,400	2,346	0.53	A	5,500	3,154	0.57	A
E. Washington Street to Old Redwood Highway	NB	4,400	1,962	0.45	A	5,500	2,458	0.45	A
	SB	4,400	2,138	0.49	A	5,500	3,325	0.60	B

1. Assumes freeway capacity of 2,200 vehicles per hour per regular lane (existing and future conditions) and 1,100 vehicles per hour per HOV lane (future conditions only).

Freeway Segment	Direction	Existing Conditions				Future with Project Conditions			
		Theoretical Capacity ¹	Volume	V/C	LOS	Theoretical Capacity ¹	Volume	V/C	LOS
Kastania Road to Petaluma Boulevard S.	NB	4,400	3,445	0.78	C	5,500	5,338	0.97	E
	SB	4,400	1,988	0.45	A	5,500	2,715	0.49	A
Petaluma Boulevard S. to Lakeville Highway	NB	4,400	3,203	0.73	C	5,500	4,480	0.81	D
	SB	4,400	1,962	0.45	A	5,500	2,569	0.47	A
Lakeville Highway to E. Washington Street	NB	4,400	3,570	0.81	D	5,500	4,672	0.85	D
	SB	4,400	2,346	0.53	A	5,500	2,988	0.54	A
E. Washington Street to Old Redwood Highway	NB	4,400	3,462	0.79	C	5,500	4,424	0.80	C
	SB	4,400	2,525	0.57	A	5,500	3,594	0.65	B

1. Assumes freeway capacity of 2,200 vehicles per hour per regular lane (existing and future conditions) and 1,100 vehicles per hour per HOV lane (future conditions only).

Table 3.3-1: Park and Open Space Acreage in Petaluma

Type	Existing (2005)
City Owned Parks	<u>308</u>
Community (See Table 3.3-2)	<u>204</u>
Neighborhood (See Table 3.3-3)	<u>102</u>
Other (See Table 3.3-4)	2.2
Regional (See Table 3.3-5)	<u>525</u>
Joint Use	<u>62</u>
Partnerships	<u>161</u>
Open Space	<u>953</u>
Total	<u>2,009</u>

Table 3.3-2: Existing Community Parks

<i>Map Code</i>	<i>Parks</i>	<i>Active</i>	<i>Passive</i>	<i>Estimated Acreage</i>
1	Lucchesi	x		31
2	McNear	x		8
3	Prince Park	x		22
4	Rocky Memorial Dog		x	10
5	Shollenberger		x	16
6	Wiseman	x		21
7	Kenilworth (includes library)	x		3
8	Leghorns	x		7
9	Steamer Landing		x	5
<u>10</u>	<u>Petaluma Swim Center & Skate Park</u>	<u>x</u>		<u>2.3</u>
Total Community Parks				125.3

Table 3.3-3: Existing Neighborhood Parks

<i>Map Code</i>	<i>Parks</i>	<i>Active</i>	<i>Passive</i>	<i>Estimated Acreage</i>
<u>11</u>	<u>Arroyo</u>		x	<u>3</u>
<u>12</u>	<u>Bond</u>	x		<u>6</u>
<u>13</u>	<u>Casa Del Oro</u>	x		<u>3</u>
<u>14</u>	<u>Cherry Valley</u>		x	<u>1</u>
<u>15</u>	<u>Country Club</u>		x	<u>2</u>
<u>16</u>	<u>Eagle</u>	x		<u>4</u>
<u>17</u>	<u>Glenbrook</u>		x	<u>4</u>
<u>18</u>	<u>Grant</u>		x	<u>1</u>
<u>19</u>	<u>La Tercera</u>	x		<u>3</u>
<u>20</u>	<u>McDowell</u>	x		<u>4</u>
<u>21</u>	<u>McDowell Meadows</u>		x	<u>1</u>
<u>22</u>	<u>Meadow View</u>		x	<u>3</u>
<u>23</u>	<u>Miwok</u>	x		<u>4</u>
<u>24</u>	<u>Oak Hill</u>	x		<u>5</u>
<u>25</u>	<u>Penry</u>		x	<u>1</u>
<u>26</u>	<u>Sunrise</u>		x	<u>3</u>
<u>27</u>	<u>Turnbridge</u>		x	<u>3</u>
<u>28</u>	<u>Walnut</u>		x	<u>2</u>
<u>29</u>	<u>Westridge Open Space</u>		x	<u>4</u>
<u>30</u>	<u>Wickersham</u>		x	<u>2</u>
<u>31</u>	<u>Southgate</u>		x	<u>1</u>
<u>32</u>	<u>Westhaven (Rockridge Pointe)</u>		x	<u>2</u>
<u>33</u>	<u>Mannion Knoll</u>		x	<u>9</u>
<u>34</u>	<u>Fox Hollow/Turtle Creek</u>		x	<u>4</u>
<u>35</u>	<u>McNear Landing</u>		<u>x</u>	<u>1</u>
<u>36</u>	<u>River View</u>		<u>x</u>	<u>2</u>
Total Neighborhood Parks				78

Table 3.3-4: Existing Pocket Parks

<i>Map Code</i>	<i>Parks</i>	<i>Active</i>	<i>Passive</i>	<i>Estimated Acreage</i>
<u>37</u>	Center		x	0.1
<u>38</u>	Crinella		x	0.3
<u>39</u>	Howard & Liberty		x	0.2
<u>40</u>	Maria & Sonoma Mt. Parkway		x	0.3
<u>41</u>	Putnam Plaza		x	0.2
<u>42</u>	Sunset		x	0.5
<u>43</u>	Western & Baker		x	0.2
<u>44</u>	Anna's Meadows		x	0.3
<u>45</u>	Cavanagh Landing		x	0.1
Total Pocket Parks				2.2

Table 3.3-6: Existing Urban Separators

<i>Map Code</i>	<i>Urban Separators</i>	<i>Estimated Acreage</i>
<u><i>Existing Urban Separators</i></u>		<u>157</u>
	Cader Farms Highlands	10
	Cross Creek	14
	<u>Wiseman (Not including 21 acres included as Wiseman Park in Table 3.3-2)</u>	<u>7</u>
	Graystone (contains Kenilworth Jr. High and Corona Creek playfields)	23
	Heritage	8
	Kingsmill	4
	Mountain Valley (contains playfields)	7
	Westridge Knolls	76
	Southgate	4
	Stratford Place	4
<u><i>Proposed Urban Separators</i></u>		<u>97</u>
Total Urban Separators		<u>254</u>

Table 3.3-7: Parks Proposed Under the General Plan

<i>Map Code</i>	<i>Parks</i>	<i>Active</i>	<i>Passive</i>	<i>Estimated Acreage</i>
Proposed Community Parks				<u>79</u>
P-1	Steamer Landing (future phases)		x	20
P-2	Johnson Property	x		7
P-3	Pomeroy/Riverfront Site	x		7
P-4	East of Airport Site	x		25
P-5	Fairgrounds	x		<u>20</u>
Proposed Neighborhood Parks				<u>24</u>
P-6	Holmberg			<u>2</u>
P-7	UoP Property - Davidson Homes		x	3
P-8	Jessie Lane - Cobblestone Homes	x		3
P-9	Dutra Quarry		x	3
P-10	Petaluma Golf & Country Club		x	3
P-11	Former Kenilworth Site	x		2
P-12	Westridge Urban Separator Ball Field	x		3
P-13	Arroyo Park Expansion		x	<u>5</u>
Total New Parkland Under the General Plan				<u>103</u>

Table 3.3-8: Summary of Park Standards and Park Needs

	<i>Population</i>	<i>Citywide Standard (Acres/1,000 residents)</i>	<i>Total Acreage Required to Meet Standard</i>	<i>Acreage Provided</i>	<i>Parkland Ratio</i>
Existing Conditions (2005)	<u>56,542</u>	5.0	283	<u>286</u>	<u>5.1</u>
Future Buildout (2025)	72,707	5.0	363	<u>389</u>	5.3

Table 3.5-6: Estimated Total Energy Consumption in Petaluma, 2005

<i>Energy Type</i>	<i>Energy Use (standard measurement)</i>	<i>Energy Use (Million Btu)</i>
Transportation Fuel	<u>33.23</u> million gallons	<u>422.493</u>
Natural Gas	<u>11,913,445</u> therms	<u>119.106</u>
Electricity	<u>450,974,402</u> kWh	<u>153.88</u>
Total Use		<u>695.479</u>

Notes:

- a. Standard units were converted into British thermal units (Btu). A Btu is the quantity of heat required to raise the temperature of one pound of water from 60 degrees Fahrenheit to 61 degrees at a constant pressure of one atmosphere. One kWh is equal to 3,412.14148 Btu, and one therm is equal to 99,976.124488 Btu. One million gallons of transportation fuel is estimated to equal 12.7142 Btu, although the heterogeneity of transportation fuels results in variation in this conversion factor over time.
- b. Natural gas and electrical consumption were estimated using unpublished regional energy consumption factors, broken out by different land uses, provided by the California Energy Commission. The factors were multiplied by the square footage devoted to each land use type in 2005, statistics that are maintained by the City of Petaluma.
- c. Transportation fuel consumption was estimated using the transportation model prepared by Fehr and Peers for the Transportation section of the Draft EIR. Fuel consumption is based on vehicle miles traveled.

Sources: California Energy Commission, City of Petaluma Planning Department, Fehr and Peers Traffic Consultants, Winzler and Kelly, and EIP Associates, a division of PBS&J.

Table 3.8-1 Special Status Species... See pages 110-116 of FEIR

Table 5.2-1: Buildout Comparison – Proposed Project and Alternatives

	<i>Proposed Project</i>	<i>Alternative 1 (No Project)</i>	<i>Alternative 1 (Infill/Arterial Development Focus)</i>	<i>Alternative 3 (River Corridor Development Focus)</i>
Residential				
Housing Units	27,949	26,560	28,761	29,580
Population	72,707	69,094	75,714	77,870
Non-Residential				
Floor Area ²	22,983,000	26,067,328	25,593,646	24,848,063
Total Jobs	<u>46,540</u>	46,601	48,100	47,600
Jobs/Housing Balance				
Employed Residents	44,450	42,244	44,300	47,400
Jobs/Employed Residents Ratio	<u>1.05</u>	1.10	1.09	1.01

2. 1. No UGB expansion is proposed.
3. 2. Buildout of the No Project Alternative would result in a higher non-residential square footage than the proposed General Plan and the other alternatives, but fewer jobs, because it assumes a larger amount of industrial development, which has a lower number of employees per square foot than office and commercial uses.

GENERAL PLAN 2025 FINAL EIR

Significant and Unavoidable Impacts

- 3.2-1 Increased motor vehicle traffic would result in unacceptable level of service (LOS) at specific study intersections.
- 3.10-1 Buildout of the proposed General Plan would result in population levels that could conflict with the Bay Area 2005 Ozone Strategy.
- 3.10-6 Implementation of the proposed General Plan may result in a cumulatively considerable incremental contribution to the significant cumulative impact of Global Climate Change.

See ES-5 Table Summary of Impacts and Policies and Programs that Reduce the Impact for applicable policies and programs to reduce all impacts, including those found to be significant and unavoidable even after mitigation.

SUMMARY OF CITY COUNCIL CONSIDERATION OF LAND USE MAP DESIGNATIONS (as of April 23, 2007)

The Table below provides only a brief summary of requests for consideration/reconsideration of specific Draft General Plan 2025 Land Use Map designations. For more detailed information regarding these issues please see the respective packets and/or Planning Commission and City Council meeting notes available from the Department of General Plan Administration (707)778-4552. The outcome of these land use considerations will be depicted on the Land Use Map (Figure 2-1) with the preparation of the Final General Plan 2025.

Pckt #	Property/Site	1987 General Plan	Draft General Plan 2025	Request	Staff Recommendation	Planning Commission Recommendation	City Council Direction
1A	Copeland Street Extension to Petaluma Boulevard in vicinity of Oak Street, potential impact on APNs 006-163-040 & 006-163-041.	The 1987 General Plan and the CPSP do not propose this extension.	Extension across Petaluma River to Petaluma Boulevard North in the vicinity of Oak Street.	Concern and protest by property owner representative of impact of street extension to property's development potential.	Retain extension of Copeland Street.	Retain extension of Copeland Street.	Retain extension of Copeland Street.
1B	Lands of Washington Group International (former Pomeroy site) APNs 007-171-023, 136-010-024	River Dependent Industrial (CPSP)	River Dependent Industrial	Request from Owner to amend land use designation to Mixed Use.	River Dependent Industrial	River Dependent Industrial	River Dependent Industrial
1C	Lands of Lind APN 007-700-005	River Dependent Industrial (CPSP)	Mixed Use	Staff request to amend from River Dependent to Mixed Use, parcel does not have river frontage.	Mixed Use	Mixed Use	Mixed Use
3A	515 E. Washington St.	Thoroughfare Commercial	Diverse Low Density Residential 6.1-12.0 du/acre	N/A – Correction of drafting error.	Mixed Use	Mixed Use	Mixed Use
7A	Lands of Sovel 2595 Petaluma Blvd N. APN 048-180-001	Rural Residential 0.0-0.5 du/acre	Split designation of Rural (0.0-0.5 du/acre) and Low Density Residential (2.1-8.0 du/acre)	Increase amount of Low Density Residential – Request from Owner	Rural /Low Density Residential as depicted on Draft Land Use Map	Rural /Low Density Residential as depicted on Draft Land Use Map	Rural /Low Density Residential as depicted on Draft Land Use Map
7B	Lands of Vogensen 1755 Petaluma Blvd. N.	Rural Residential 0.0-0.5 du/acre	Low Density Residential 2.1-8.0 du/acre	Medium Density Residential 8.1-18.0 du/acre – Request from Owner	Low Density Residential 2.1-8.0 du/acre	Low Density Residential 2.1-8.0 du/acre	Low Density Residential 2.1-8.0 du/acre

Pckt #	Property/Site	1987 General Plan	Draft General Plan 2025	Request	Staff Recommendation	Planning Commission Recommendation	City Council Direction
8A	Lands of Davidon	Suburban Residential 0.6-2.0 du/acre with Urban Separator, Open Space along Creek and Proposed Park	Very Low Residential 0.6-2.0 du/acre with 300' Urban Separator, Open Space along creek, and Proposed Park (min. of 3 acres)	Down designate to Rural Residential 0.1-0.5 du/acre and require 6-acre park. – Request from Neighboring Property Owners	Very Low Residential 0.6-2.0 du/acre with 300' Urban Separator, Open Space along creek, and Proposed Park (min. of 3 acres)	Very Low Residential 0.6-2.0 du/acre with 300' Urban Separator, Open Space along creek, and Proposed Park (min. of 3 acres)	Very Low Residential 0.6-2.0 du/acre with 300' Urban Separator, Open Space along creek, and Proposed Park (min. of 3 acres), in addition Council provided list of criteria for this property to include in Draft General Plan.
8B	Lands of Asbell, Irwin/Nieuwbower, Mills APNs 019-130-011, 041, 043, 046, and 047	Suburban Residential 0.6-2.0 du/acre	Very Low Residential 0.6-2.0 du/acre	Request from Property Owners to amend to Low Density Residential 2.1-8.0 du/acre	Low Density Residential 2.1-8.0 du/acre	Low Density Residential 2.1-8.0 du/acre	Low Density Residential 2.1-8.0 du/acre
8C	Lands of Robin 1436 Western Avenue APN 019-090-056	Rural Residential 0.0-0.5 du/acre	Rural Residential 0.1-0.5 du/acre	Property owner request to amend to Very Low Density Residential .6-2.0 du/acre	Rural Residential 0.1-0.5 du/acre	Rural Residential 0.1-0.5 du/acre	Rural Residential 0.1-0.5 du/acre
10A	Lands of Petaluma Preservation Group, LLC 450 Jefferson Street APN 007-163-002	Industrial	Mixed Use	High Density Residential 18.1 – 30.0 du/acre	High Density Residential 18.1 – 30.0 du/acre	High Density Residential 18.1 – 30.0 du/acre	High Density Residential 18.1 – 30.0 du/acre
10B	Two blocks bounded by Jefferson Street, Wilson and Vallejo Streets	Industrial, School and Public Institutional	Industrial and School	Commission generated discussion regarding amending designation to Mixed Use	Industrial and School	Industrial and School	Industrial and School
11A	Lands of DSL APNs 007-380-005, 027	Special Industrial/ Office Park	Mixed Use	Community Commercial	Community Commercial	Mixed Use	Mixed Use
11C	Lands of Agnese, Hummel and Benson APNs 007-431-	Agriculture and Open Space	Agriculture and Urban Separator	Request by Agnese and Hummel representatives to designate as	Retain Agriculture Designation and Urban Separator	Retain Agriculture Designation and Urban Separator	Retain Agriculture Designation and Urban Separator

Pckt #	Property/Site	1987 General Plan	Draft General Plan 2025	Request	Staff Recommendation	Planning Commission Recommendation	City Council Direction
	003, 007-431-004, 007-432-003			Business Park. Note: Earlier reports considered Business Park designation.			
11D	Lands of Adobe House 750 N. McDowell Blvd. APN 137-061-037	Office	High Density Residential 18.1-30.0 du/acre	Request by owner for Business Park similar to current designation	Designate Business Park	Designate Business Park	Designate Business Park
12A	Lands of Delco Builders & Developers 470 & 498 Corona Road APNs 137-061-009, 011	Rural Residential 0.0-0.5 du/acre	Split designation of Very Low Density Residential (.6-2.0 du/acre) and Low Density Residential (2.1-8.0 du/acre)	Owner request to increase portion of Low Density Residential. Note: Request retracted after Planning Commission.	Split designation of Very Low Density Residential (.6-2.0 du/acre) and Low Density Residential (2.1-8.0 du/acre)	Split designation of Very Low Density Residential (.6-2.0 du/acre) and Low Density Residential (2.1-8.0 du/acre)	Split designation of Very Low Density Residential (.6-2.0 du/acre) and Low Density Residential (2.1-8.0 du/acre)
13A	Lands of Living Word Evangelical Lutheran Church 901 Ely Boulevard South APN 017-060-020	Public Institutional	Public/Semi Public	Designate a portion of property as Medium Density Residential 8.1-18.0 du/acre to allow church to remain and some residential units to be built and sold.	Public/Semi Public	Designate a portion of property as Low Density Residential (2.1-8.0 du/acre).	Designate a portion of church property as Low Density Residential (2.1-8.0 du/acre) with open space along the drainage swale.
13B	Lands of City of Petaluma APN 017-230-037	Proposed School District Lands	Split designation of Medium Density Residential 8.1 – 18.0 du/acre north west of drainage swale with Public Park south east of swale	Citizen input to reduce density on City-owned parcel adjacent to Arroyo Park.	Split designation of Medium Density Residential 8.1 – 18.0 du/acre northwest of drainage swale with Public Park southeast of swale.	Reduce portion of Medium Density Residential to Low Density Residential (2.1 to 8.0 du/acre).	Designate entire parcel as City Park.
14A	Lands of St. Vincent's High School 624 Cherry Street APN 006-021-015	Urban Standard 2.1-5.0 du/acre	Low Density Residential 2.1-8.0 du/acre	Education	Education	Education	Education

Pckt #	Property/Site	1987 General Plan	Draft General Plan 2025	Request	Staff Recommendation	Planning Commission Recommendation	City Council Direction
7C	Lands of Bennett (240 Jessie Lane) and Bouch (200 Jessie Lane) APNs: 048-141-029 048-141-031	Rural Residential 0.0-0.5 du/acre	Rural Residential 0.1-0.6 du/acre	Owners request amendment from Rural Residential (0.1-0.6 du/acre) to Low Density Residential (2.1-8.0 du/acre).	N/A	Split land use designations on both parcels to retain 2-acre portions of Bennett and Bouch properties as Rural Residential with Low Density Residential on remaining lower portion of each property.	Split land use designations on both parcels to retain 2-acre portions of Bennett and Bouch properties as Rural Residential with Low Density Residential on remaining lower portion of each property.
7D	Lands of Johnson and surrounding parcels APNs: 048-142-005 048-142-004 048-142-012 048-142-011 048-142-010 019-020-019 019-020-020 019-020-018 019-020-010 019-020-012	Thoroughfare Commercial	Industrial	Request by Johnson (APN 048-142-005) to amend land use from Industrial to Mixed Use. Staff recommends evaluating this request within the context of the surrounding lands also designated as Industrial.	Retain proposed Industrial designation.	Retain proposed Industrial designation.	Retain proposed Industrial designation.
12B	Lands of Avila and adjacent properties APNs: 149-413-023 149-413-024 149-413-025	Urban Diversified (5.1-10.0 du/acre)	Medium Density Residential (8.1-18.0 du/acre)	Request by citizens to reconsider Medium Density Residential on Avila property, and instead designate site Low Density Residential (2.1-8.0 du/acre). Staff recommends evaluating this request within the context of the two adjacent properties with a Medium Density designation.	Medium Density Residential (8.1-18.0 du/acre) and allow the entitlement process to address site specific constraints.	N/A	Designate properties as Low Density Residential (2.1-8.0 du/acre).

Schedule of Public Workshops and Hearings held following publication of Draft EIR and Revised Draft EIR

[Does not include numerous earlier workshops and/or hearings on community visioning, Existing Conditions, Opportunities & Challenges Report, Land Use and Mobility Alternatives Report, or the Draft General Plan document held by the various Commissions and Committees.]

Planning Commission (14 hearings):

Draft EIR:

September 26, 2006;
October 10 and October 24, 2006;
November 14 and November 28, 2006;
December 12, 2006;
January 9 and January 23, 2007;
February 13 and February 27, 2007;
March 14 and March 27, 2007 (hearing closed).

Revised Draft EIR (Greenhouse Gas Emissions):

November 27, 2007 (introductory workshop);
December 11, 2007 (hearing).

City Council (18 hearings):

Draft EIR:

October 2 and October 16, 2006;
November 6 and November 20, 2006;
December 4 and December 18, 2006;
January 22, 2007;
February 12, February 20, and February 26, 2007;
March 5 and March 19, 2007;
April 14 and April 23, 2007;
May 7 and May 21, 2007 (closed public hearing)

Revised Draft EIR (Greenhouse Gas Emissions):

December 3, 2007 (introductory workshop);
January 7, 2008 (hearing closed).

List of Primary Persons Consulted in Preparation of Final EIR

The City of Petaluma

Pamela Tuft, AICP, Director, General Plan Administration Department
Scott Duiven, Senior Planner
Karen Thoreson, Secretary

Chris Albertson, Fire Chief
Michael Ban, Director, Department of Water Resources and Conservation
Dean Eckerson, Engineering Manager
Scott Brodhun, Director, Parks and Recreation Department
Michael Moore, Director, Community Development Department

Consultant Team

Winzler & Kelly

Bahman Sheikh, Ph.D.
Pat Collins
Kristine Gaspar
Mary Grace Pawson, PE

EIP Associates

John Steere, project Manager
Melissa Duncan, Associate Manager
Natalie Irwin, Associate Scientist
Russell Kobayashi, Associate Biologist
George Burwasser, Senior Scientist

Fehr & Peers

Colin Burgett, AICP, Transportation Planner
Matt Haynes, P.E., Transportation Engineer
Matthew Ridway, AICP, Principal

Mundie and Associates

Roberta Mundie
Suzanne Lampert

West Consultants, Inc.

David S. Smith, P.E., D.WRE, CFM

Dodson Psomas

Dana Hunt

West Yost & Associates

Kenneth Loy