FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED CENTRAL PETALUMA SPECIFIC PLAN

SCH Number: 2002-112-039

Prepared by the

CITY OF PETALUMA

with the assistance of

WAGSTAFF AND ASSOCIATES
Urban and Environmental Planners

April 2003

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1. INTRODUCTION

1.1 RELATIONSHIP BETWEEN DEIR AND FEIR

In conformance with the California Environmental Quality Act (CEQA) Guidelines (2002) section 15132 (Contents of Environmental Impact Reports), the Final Environmental Impact Report (Final EIR) for the proposed Central Petaluma Specific Plan consists of two volumes: (1) the March 2003 Draft EIR, which was distributed for public review and comment on March 4, 2003; and (2) this April 2003 Final EIR document, which incorporates the Draft EIR by this reference, and includes responses to comments received by the Lead Agency (the City of Petaluma) during the public review period on the Draft EIR, plus a set of revisions made to the Draft EIR in response to comments received during the public review period. None of these revisions includes a substantial increase in the severity of an identified significant impact or the identification of a significant new impact, new mitigation, or new alternative considerably different from those already considered in preparing the Draft EIR.

Certification of this Final EIR by the Petaluma City Council must occur prior to adoption of the proposed Central Petaluma Specific Plan by the Petaluma City Council.

1.2 PROPOSED PROJECT

The City of Petaluma is proposing to adopt the Central Petaluma Specific Plan. The proposed Specific Plan is intended to facilitate creation of a reinvigorated Petaluma central area that accommodates a greater diversity and intensity of activities, including the continuation of traditional industries, as well as new environments for living and working in proximity to the downtown and the river. The proposed Specific Plan provides for a mixture of new employment, housing, and retail land uses developed around the downtown, the riverfront warehouse subarea, and two future transit centers--one located at the historic Petaluma Depot site and one on Caufield Lane.

The proposed Specific Plan area encompasses nearly 400 acres within the heart of the city, roughly bounded by Lakeville Street on the north and northeast, Petaluma Boulevard and the Petaluma River on the south and west, and U.S. Highway 101 on the east. The area includes a combination of developed, underutilized, and vacant properties, and a mix of retail, office, service commercial, single- and multi-family residential, heavy commercial, and industrial uses. A large portion of the proposed Specific Plan area overlaps with the City-adopted and recently-amended Central District Redevelopment Plan area.

For planning purposes, the proposed Specific Plan describes the Specific Plan area in terms of "four specific districts with similar groupings in land use"--the North River subarea, Turning Basin subarea, Riverfront Warehouse subarea, and Lower Reach subarea. Within each of these subareas, the Specific plan encourages land use flexibility, "recognizing that Central Petaluma is different from other parts of the city, and that a clear distinction between living and working environments is less important than intensity and character."[1] The plan encourages the building of more flexible building types in the central area that accommodate "mixed uses within a single structure"[2] or which "foster live/work environments."[3] The plan advocates a central area ability to build more intensely through provision for "greater densities, mixed use incentives, and the development of structured parking facilities."[4]

To these ends, the Specific Plan proposes the establishment of three primary land use designations: Agricultural Support Industrial, River-Dependent Industrial and Mixed Use. The two industrial designations are intended to complement the Specific Plan's objective to support and maintain existing river dependent and agricultural support industries in the plan area. The Mixed Use designation is intended to facilitate the overall mix of land uses envisioned for the entire planning area.

This brief summary should not be relied upon for a thorough understanding of the proposed project. Please refer to Chapter 3 (Project Description) of the January 2001 Draft Environmental Impact Report for the Petaluma Central Business District Redevelopment Plan Amendment for a more complete description of the proposed redevelopment program.

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[1]City of Petaluma, Central Petaluma Specific Plan, February 2003 Draft, page 20.

[2]Ibid., page 20.

[3]Ibid., page 20.

[4]Ibid., page 20.

2. RESPONSES TO COMMENTS ON THE DRAFT EIR

After completion of the Draft EIR, the Lead Agency (the City) is required under CEQA Guidelines sections 15088 and 15686 to consult with and obtain comments from other public agencies having jurisdiction by law with respect to the project (the proposed Specific Plan), and to provide the general public with an opportunity to comment on the Draft EIR. Under CEQA Guidelines section 15088, the Lead Agency is also required to respond in writing to substantive environmental points raised in this Draft EIR review and consultation process.

The Draft EIR, dated March 2003, was distributed for public review and comment on March 4, 2003. The required 45-day public review period on the Draft EIR also began on March 4, 2003 and was extended to end on April 21, 2003. Two public hearings on the adequacy of the Draft EIR were conducted during the public review period: one by the City of Petaluma Planning Commission at its regular meeting of March 25, 2003, and one by the City of Petaluma Site Plan and Architectural Review Committee at its regular meeting of March 27, 2003.

Comments received on the Draft EIR during the public review period were submitted in the form of oral comments by members of the Planning Commission and members of the public during the March 25, 2003 Planning Commission meeting, oral comments by members of the Site Plan and Architectural Review Committee (SPARC) and members of the public during the March 27, 2003 SPARC meeting, and fourteen (14) letters and memoranda received by the City.

This Response to Comments chapter includes the following subsections:

- An **index to comments received during the Draft EIR public review period** (section 2.1), which lists the persons and public agencies commenting on the Draft EIR during the public review period, assigns a code number to each substantive comment raised, and provides a summary indication of the comment issue.

- A **responses to Planning Commission meeting comments** section (section 2.2), which includes the minutes of the March 25, 2003 Planning Commission meeting and public hearing on the Draft EIR, followed by the responses of the Lead Agency (the City) to each comment pertaining to EIR process, content, or adequacy. Each substantive comment raised is coded in the right margin of the minutes. The written responses to each of the various coded comments follow the minutes.

- A response to SPARC meeting comments section (section 2.3), which includes the minutes of the March 27, 2003 SPARC meeting and public hearing on the Draft EIR, followed by the responses of the Lead Agency (the City) to each comment pertaining to

EIR process, content, or adequacy. Each substantive comment raised is coded in the right margin of the minutes. The written responses to each of the various comments follow the minutes.

- A responses to written comments section (section 2.4), which includes copies of all 14 letters and memoranda received by the City during the public review period, each followed by the written responses of the Lead Agency (the City) to each comment pertaining to EIR process, content or adequacy. Each substantive comment raised is coded in the right margin of the letters and memoranda. The written responses to the various coded comments follow each letter and memoranda.

2.1 INDEX TO ALL COMMENTS RECEIVED

Name/Agency	Response Code	Issues and Concerns
1. Planning Commission Regular Meeting of March 25, 2003:		
A number of the Planning Commissioner and public comments on the Draft EIR made at the March 25, 2003 Planning Commission meeting were adequately responded to at the meeting. Commissioner and public comments coded below are limited to those which warrant additional written responses and/or revisions to the EIR.		
Katherine J. Rinehart, MA Historian P.O. Box 163 Petaluma	PC.01	Concerns regarding Draft EIR information and findings pertaining to historic resources. Submitted detailed comments in writing--see comments PC.07 through PC.30.
Diane Reilly Torres Rainier Avenue Petaluma	PC.02	Public utilities not adequately covered in section 3.6.6 on page 3-21 of Draft EIR. No TV cable service is provided in portions of the Specific Plan area; important.
Commission Chair Barrett	PC.03	If a statement of overriding considerations were adopted by the City for historic resources impacts, could a historic building be demolished with no additional CEQA compliance requirements.
Commission Chair Barrett	PC.04	Change suggested for Draft EIR Mitigation 13-4 regarding expansive soil impacts: language should include, "but not limited to."
Commission Chair Barrett	PC.05	Concerns regarding adequate Draft EIR consultation/coordination with the Northwest Information Center for cultural/historic resources section.

Commissioner Asselmeier	PC.06	Question regarding possibility of smaller park areas being developed on western side of the river.
Katherine J. Rinehart, MA Historian P.O. Box 163 Petaluma	PC.07	Neither Draft EIR nor Draft Specific Plan includes adequate protection or identification of historic resources in Specific Plan area. Identification presented in both documents is confusing and incomplete.
	PC.08	Language on Draft EIR page 7-2 regarding number of historic districts in planning area is in conflict with Specific Plan.
	PC.09	Draft EIR refers on page 7-7 under Impact 7-2 to historic districts "created" under Specific Plan; Specific Plan only recommends creation of two historic districts.
	PC.10	Draft EIR on page 7-3 under subsection (c) refers to businesses in area that no longer exist.
	PC.11	Draft EIR page 7-7 under subsection (a) states that proposed Specific Plan "provides" for historic district expansion, implying that Plan as written will assure that this will occur when in fact Plan only makes recommendations.
	PC.12	Plan discusses historic resources as though term only applies to buildings; legal definition under CEQA includes archaeological resources as well (Public Resources Code 5020.1).
	PC.13	Historic buildings evaluation limited to windshield survey based on National Register Criteria; how can windshield survey adequately identify and evaluate all potentially significant historic resources in 400-acre project area?
	PC.14	According to Specific Plan and Draft EIR, National Register Criteria used to determine significance of historic resources. Public Resources code section 5024.1, Title 14, CCR, section 4852, cites criteria for listing in the California Register of Historic Resources. Why did historic resources survey rely solely on National Register criteria?
	PC.15	Draft EIR states on page 7-8 that purpose is to streamline review process for future projects. However, as written, Draft EIR proposes that

much of impact evaluation be done on project-by-project basis at a future time. By putting off evaluation to later date, EIR is not achieving streamlined approach for cultural resources and does not meet obligation under CEQA to identify impacts up front.

PC.16 By treating historic properties on a case-by-case basis, Draft EIR does not address whole historic district concept presented in Specific Plan, which states that, although individual property on its own may not be significant, it could contribute to a significant district. Treating historic resources on a case-by-case basis not adequate.

PC.17 Draft EIR states that information for chapter 7 (Cultural and Historic Resources) was obtained from the Northwest Information Center (NWIC). NWIC states that they have not been given opportunity to review Draft EIR. Their comments are attached. [See letter 2 herein from NWIC and associated Final EIR responses.]

PC.18 Draft EIR page 7-1 refers to October 2001 Petaluma Specific Plan Draft Historic Resource Evaluation. Where is this document? Was final Draft ever prepared? Plan itself only refers to windshield survey and general data gathering.

PC.19 Draft EIR page 7-2 refers to Cary & Co. identification of 66 potentially significant properties within Specific Plan area. Draft EIR should provide list of addresses of all identified resources for comparison with Specific Plan "for consistency." Must also take into consideration that current lists included in Specific Plan are incomplete and need to be expanded (comment refers to specific comments made in this regard at March 11, 2003 Planning Commission meeting on Specific Plan).

PC.20 Draft EIR page 7-3 refers to "San Francisco and Northern Pacific Railroad, Petaluma and Santa Rosa Railroad and Petaluma Depot." Does this mean train tracks associated these railroads? If so, Draft EIR should note that part of Petaluma and Santa Rosa tracks were taken up after the Petaluma and Santa Rosa Railroad car barns burnt down.

PC.21 Draft EIR references to Petaluma Railroad should be clarified to indicate that this means the Northwestern Pacific Railroad Depot buildings (three). The only building associated with the Petaluma and Santa Rosa Railroad is the former ticket office currently located on Weller Street.

PC.22 Draft EIR page 7-3 includes a paragraph on the Riverfront Warehouse Subarea. There needs to be a list of potentially significant resources identified here in the historic resources survey, that presumedly exists.

PC.23 Same paragraph refers to a number of business identified in this subarea. With exception of the Corliss Gas Engine Company and a portion of the Foundry, none of these buildings exist; they were located within the Riverfront Warehouse District during the 19th and early 20th centuries.

PC.24 The Saddle Tree Factory and Centennial Planing Mill were once located on the corner of D and First Street on the approximate site of what today is River Town Feed.

PC.25 The Petaluma Fruit Canning Company was on the east side of First Street at the corner of F Street. Later it became the site of the Heyneman and Company Overall Factory. The property is now vacant and used for parking.

PC.26 Sonoma Preserve was located on 2nd Street at the foot of B Street. Property is now a parking lot and is being developed by Basin Street Properties.

PC.27 Petaluma Box Factory was located on 2nd Street behind what is now parking lot for Foundry Wharf.

PC.28 Draft EIR page 7-3 paragraph on Lower Reach Subarea should specify that reference to San Francisco and Northern Pacific railroad pertains to tracks associated with the Northwestern Pacific Railroad.

PC.29 Draft EIR page 7-7, section (a), states that Cary & Co. survey applied rules set forth in CEQA for determining potentially significant resources. According to the draft Specific Plan, Carey & Co. used National Register criteria to evaluate

		significance. Typically, CEQA projects require use of California Register criteria. The Plan also states that these evaluations were developed based on a windshield survey, not on an in depth analysis, and further research is needed. How can evaluation be made when Draft EIR acknowledges that further research is needed?
	PC.30	Draft EIR page 7-7 language re: recommended extension of Petaluma Historic Commercial District includes confusing wording. Plan recommends that additional research be conducted and a nomination for city designation be prepared. Sentence neglects to mention that Plan also recognizes that the North River Subarea may qualify as a historic district.

Site Plan and Architectural Review Committee (SPARC) Regular Meeting of March 27, 2003:

A number of SPARC member and public comments on the Draft EIR made at the March 27, 2003 SPARC meeting were adequately responded to at the meeting. SPARC member and public comments coded below are limited to those which warrant additional written responses and/or revisions to the EIR.

Katherine J. Rinehart, MA Historian P.O. Box 163 Petaluma	SP.01	Referred to comments submitted in writing--i.e., comments PC.07 through PC.30 as coded, summarized, and responded to in this Final EIR document.
Committee Member Hurley	SP.02	With statement of overriding considerations for historic resources impacts, the EIR process for the plan would abdicate responsibility for addressing historic resources impacts--i.e., would permit future review of development alternatives involving impacts on historic resources without an EIR. The threat of an EIR helps protect historic resources. SPARC should not recommend SOC for historic purposes. Draft EIR indicates that a cultural survey has been done and has identified significant resources; however, this has not been done.
Committee Chair Rittenhouse	SP.03	Is only way to avoid adoption of Statement of Overriding Considerations for historic resources to not certify the EIR? (See staff response.)
Committee Member Gracyk	SP.04	Traffic mitigations 6-6 and 6-7 not feasible.

Committee Member Gracyk	SP.05	Conflicts regarding visual impact mitigations relative to SMART Code need to be resolved. More site planning flexibility needed. Clarify language.
Committee Member Barrett	SP.06	Recommends against adoption of Statement of Overriding Consideration for historic resources. Instead, supports preparation of full EIR and public hearing for projects involving demolition of historic resources.
Committee Member Lynch	SP.07	Supports Commissioner Barrett's proposal regarding historic resources. Threat of EIR thwarted demolition of Victory Chevrolet.
Committee Chair Rittenhouse	SP.08	Draft EIR mitigations are generally sufficient. Supports public hearing for projects involving demolition of historic resources.
Committee Chair Rittenhouse	SP.09	Motion to recommend that City Council certify EIR.
Committee Member Barrett		Motion seconded
		Vote: 6/0

Review Period Letters:

The 14 letters and memoranda received during the Draft EIR public review period are listed below with all comments therein pertaining to the EIR summarized and coded.

1.	State Clearinghouse, State of California Governor's Office of Planning and Research; March 10, 2003	1.01	Receipt of Draft EIR acknowledged. State review period start and end identified (March 4 through April 17, 2003)
2.	Northwest Information Center (NWIC), California Historical Resources Information System (CHRIS); March 13, 2003	2.01	Suggested edits to pages 7-2, 7-5, 7-6, and 7-7 of Draft EIR Cultural and Historic Resources chapter.

3.	Vin Smith Vice President Basin Street Properties; March 28, 2003	3.01	Re: Discrepancy between SMART Code and Specific Plan development allowances in traffic impact modeling. Smart Code development allowances would result in TAZ traffic generation rates slightly above traffic model rates reflected in Specific Plan and Draft EIR. Has City compared (calculated) development limitations of Smart Code versus proposed 25 percent cap FAR/density allowances assumed for traffic modeling. Should EIR be clarified/refined to provide CEQA compliance for Smart Code buildout?
		3.02	Mitigation for Lakeville/D Street intersection doesn't appear to work, given restricted right-of-way.
		3.03	Even with Draft EIR recommended mitigation (additional lane), intersection may drop to LOS E with Basin Street project. Will Statement of Overriding Consideration indicated by Draft EIR as necessary (significant unavoidable impact) allow for development in area beyond what is anticipated in Draft EIR, i.e., up to Smart Code permitted maximum? Or should range of possible development between 25 percent cap and Smart Code allowances be reflected in Draft EIR to permit Statement of Overriding Considerations to apply to full Smart Code buildout?
		3.04	Traffic volumes shown for Caulfield/Lakeville intersection seem very low for anticipated development on Pomeroy site and City corporation yard.
		3.05	No discussion of relocated or new railroad crossing at Caulfield Lane; should there be, including some discussion of projected future traffic volumes at the crossing assuming possible future development of this area?
4.	Todd Gracyk 615 Prospect Street Petaluma	4.01	Why does Draft EIR study/assume proposed 25 percent total buildout cap when Specific Plan does not have a proposed cap? Confusing.
		4.02	Why does Draft EIR study/assume 25 percent cap for each of the four districts? No analysis of probable 20-year buildout scenario beyond 25 percent in certain districts; speculates actual

buildout at 50 to 70 percent range in Turning Basin and Lower Reach districts.

5. Sharon L. Hromek, Petaluma Transit; April 8, 2003	5.01	Revisions recommended to Draft EIR subsection 6.1.8 regarding Petaluma Transit and Golden Gate Transit service characteristics.
6. Timothy C. Sable, District Branch Chief, Caltrans District 4, State of California Department of Transportation; April 16, 2003	6.01	Traffic analysis trip distribution and trip assignment information requested.
	6.02	For U.S. 101 ramps/Old Redwood highway intersection mitigation, vehicle queuing at adjacent intersections should be analyzed to determine if recommended mitigation is appropriate.
	6.03	For U.S. 101 southbound ramps/E. Washington intersection, what are the impacts of the Caltrans-planned new southbound loop onramp at the interchange on operations at this intersection under the cumulative scenario, including under implementation of Mitigation 6-3 (for Scenario 1)--will traffic back up on the off-ramp and onto the freeway mainline?
	6.04	The Draft EIR proposed mitigation for the Lakeville Street/D Street intersection addresses the PM peak hour operations; Table 6.7 shows AM peak hour operations at F. Has mitigation of this AM condition been studied; how will the proposed PM peak hour mitigation affect AM peak hour operation?
	6.05	Re: U.S. 101 operations, Draft EIR should include assessment of on-ramp queuing at freeway ramp intersections (to determine if on-ramp queues will extend through the ramp intersections, impacting on-ramp operations).
	6.06	Vehicle queuing from off-ramp intersections should also be addressed (to determine if queues would extend from off-ramp intersection onto freeway, resulting in even poorer freeway operations).
	6.07	Mitigations for mainline U.S. 101 and U.S. 101 ramp intersections only address PM peak hour operation; associated mitigations may or may not be appropriate to also offset AM peak hour impacts.

	6.08	Ramps-intersection analysis should include assessment of queuing and available storage at intersection approaches; inadequate storage may affect adjacent intersections (may be worse than reported).
	6.09	Appendix 21.5 questions re: (a) intersection 7 volumes; (b) configuration of new leg of intersection (Caulfield Lane extension)--driveway or road; and Scenario 1 vs. Scenario 2 traffic volume comparison.
	6.10	Appendix 21.5 questions re: intersection 8 assumptions.
	6.11	Appendix 21.5 questions re: intersection 24 traffic volume assumptions for Scenarios 1 and 2.
	6.12	Mechanism to collect fair-share fees from project developers within Specific Plan area towards U.S. 101 mitigations recommended.
	6.13	Comprehensive list of any future Specific Plan area residential projects expected to be exempt from CEQA review, and detailed discussion of their cumulative traffic capacity impacts on U.S. 101, requested now for Caltrans review.
	6.14	Completion of signed Mitigation Monitoring Certifications checklist requested by Caltrans for Mitigations 6-1 through 6-14.
7. Marianne Hurley 15 Howard Street Petaluma	7.01	Draft EIR does not adequately provide for protection of historic architectural properties. There is no provision for adequate mitigation of Draft EIR stated significant adverse impact on historic resources.
	7.02	The Draft EIR eliminates the usual CEQA process of requiring an EIR for projects that may adversely affect historic resources, essentially eliminating the requirement to explore feasible alternatives to significantly impact historic resources. A direct or focused EIR should be required when historic resources can be impacted.
	7.03	Historic resources have not been definitively identified in the plan, making Draft EIR statements about "66 potentially historic resources" incorrect and misleading.

8.	Terry Roberts Director State Clearinghouse, State of California Governor's Office of Planning and Research; April 18, 2003	8.01	Notification that state review period closed on April 17, 2003, and transmittal of letters from all state agencies who commented, including letters 6 (Caltrans) and 9 (State Department of Toxic Substances Control) responded to herein. Letter acknowledges that City has complied with State Clearinghouse review requirements pursuant to CEQA.
9.	Barbara J. Cook, P.E., Chief, Northern California--Coastal Cleanup Operations Branch, State Department of Toxic Substances Control; April 4,2003	9.01	Lead assessment requirement should be added to subsection 14.1.2 and 14.3.2 discussion.
		9.02	Review new April 19, 2003 Land Use Covenant regulations and modify Draft EIR accordingly.
		9.03	Soil contamination should be evaluated to determine potential impact of vapor intrusion into buildings, migration into groundwater and discharge of contaminants to surface water bodies or park areas.
		9.04	Important that any utility trenches or elevator shafts have clean soil to avoid need for construction period/future repair OSHA training.
		9.05	Offer of future DTSC assistance to City in overseeing future characterization and cleanup activities.
10.	Anthony Veerkamp, Senior Program Officer, Michael Buhler, Regional Attorney, Western Office, National Trust for Historic Preservation; April 21, 2003	10.01	City should make a greater public notification effort re: the availability of the Draft EIR for public review; no references to Draft EIR availability on City's website; no indication of public comment period on Draft EIR.
		10.02	Program EIR approach may result in accelerated loss of historic resources; as explained in specific comments below.
		10.03	Formulation of program EIR for Specific Plan may have ultimate effect of undermining protection of historic resources, including "physical demolition, destruction, relocation or alteration" (DEIR section 7.3.2) without consideration of broad range of alternatives.
		10.04	Unclear why demolition of historic properties is anticipated or how such activities can be deemed "pursuant to and in conformity with" a Specific

Plan purporting to "protect, enhance, perpetuate, and use properties of historic and architectural significance" (Specific Plan Final Draft, page 104).

10.05 Draft EIR explicitly states intent to streamline the future environmental review process and "reduce the need to prepare repetitive environmental studies" (DEIR section 7.3.2(b)). However, anecdotal evidence suggests that it is precisely the requirement to prepare such studies that has resulted in the preservation of historic properties in Petaluma. EIR should explicitly state that any future action that results in a "substantial adverse change" in a historic resource is not "in conformity with the Specific Plan," and thus requires preparation of a project-specific EIR.

10.06 Appears that under Draft EIR language, projects resulting in demolition of historic resources would require no further environmental review beyond Initial Study process. Mitigation 7-2 states that if City determines through Initial Study process that Secretary's Standards cannot be successfully applied, the "potential for building demolition and resulting effects on historic resources and/or historic districts would therefore represent a ***significant unavoidable impact.***" In other words, if standard cannot be met, demolition will be allowed to proceed without consideration of other alternatives in an EIR subject to public review and comment.

11. Diana Painter, Architectural Research, Preservation Planning, Urban Design, 2688A Petaluma Blvd. North, Petaluma

11.01 Resources do not have to be formally identified to be considered under CEQA (section 21084.1 of Calif. Public Resources Code, Historic Resource Guidelines).

11.02 Windshield survey does not meet Public Resources Code standards (standard #3 under section 21084.1 of the California Public Resources Code, Historic Resource Guidelines).

11.03 No documentation that substantiates 66 potential historic resources identified in plan area. Evaluation criteria required by law not fully considered. Citation of study may be misleading to the public by implying that full consideration of each potential resource and its significance was made.

	11.04	Mitigation has been established without knowing the full extent of the value of the historic resources.
	11.05	Completion of Historic Resources Survey meeting City and State guidelines is recommended; will give more guidance to developers; otherwise, future development activities involving historic resources could be challenged on a project-by-project basis.
	11.06	25 percent cap on project area buildout projection results in low projection for listed reasons; Plan and EIR should demonstrate in more detail why impact analysis based on 25 percent buildout cap is considered adequate.
	11.07	Historic resources that have not been formally determined to be an historic resource are not precluded from review under CEQA.
12. Christopher Stevick, President, Heritage Homes; April 22, 2003	12.01	Draft EIR is vague about describing specific historic resources not appropriately evaluated. Impacts of Specific Plan on historic resources therefore unknown. Mitigation cannot be established.
	12.02	Warehouse district buildings and railroad tracks contribute as part of historic resource or district; warehouse district buildings and tracks specifically significant to Petaluma's history.
	12.03	Draft EIR in may ways makes development exempt from CEQA, the state's protection against unmitigated demolition of historic resources.
	12.04	Specific Plan will fast track massive amount of development in City's historic areas.
	12.05	Draft EIR only looks at 25 percent buildout cap scenario; no additional (higher cap) scenarios were evaluated.
	12.06	Draft EIR does not make clear that there may be no deterring penalty in place for destruction of potential historic resource or for demolition of a contributor to a potential historic resource.
	12.07	The tracks should be regarded as a special cultural and historic resource; all proposed

projects that affect the track line must be evaluated to insure that they protect this resource.

13. Katherine Rinehart, 118 English Street, Petaluma; April 21, 2003 (City Council Meeting Comments)	13.01	City Council should pay particular attention to how EIR deals with historic resources, known and unknown, within Specific Plan area.
	13.02	No incentives or guarantees provided in Draft EIR that will ensure that historic resources are preserved and/or adaptively re-used; rather, the exact opposite could occur--demolition of historic buildings, whether formally recognized or not, may occur under this EIR without any significant review. EIR seeks to streamline the application process; as currently written, streamlining may be achieved at the cost of destroying many of the resources that define Petaluma's unique and historic character.
	13.03	Windshield survey inadequate for identification of historic resources.
	13.04	Draft EIR-cited historic resources report (page 7-2) does not exist. Mention of 66 potentially significant resources implies that no other potentially significant resources exists within the Specific Plan area.
	13.05	Certification of EIR as currently written and adoption of associated Statement of Overriding Considerations will authorize demolition of any building without further study and evaluation or even exploring whether or not adaptive re-use might be considered as an alternative.
	13.06	Commenter's comments and recommendations submitted to Planning Commission should be taken into consideration.
	13.07	Revise EIR language so that when a demolition of a potentially significant historic resource is proposed (above and beyond the 66 potential resources referenced in the Draft EIR), additional study/evaluation will be required. Absolutely necessary given that study conducted to identify potentially significant historic resources was only windshield survey.

14. Marc Bautista, Environmental Specialist, Sonoma County Water Agency; April 21, 2003	14.01	Revisions to Draft EIR section 8.2.1 (water setting) requested. Revisions to Draft EIR section 8.2.3 (water impacts and mitigations) requested.

2.2 RESPONSES TO COMMENTS

The following section includes minutes of the March 25, 2003 Planning Commission meeting, minutes of the March 27, 2003 Site Plan and Architectural Review Committee (SPARC) meeting, and reproductions of the 14 letters and memoranda received during the 45-day Draft EIR public review period, each immediately followed by the Lead Agency's (the City's) written responses to comments therein pertaining to the content and adequacy of the Draft EIR. The comments and responses are correlated by code numbers added to the right margin of the minutes, letters, and memoranda.

PC

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Planning Commission Minutes
March 25, 2003 – 7:00 PM

Commissioners: *Present:* Asselmeier, Barrett*, Dargie, Imm
Recused: Healy, McAllister, von Raesfeld

* Chair

Staff: Mike Moore, Community Development Director
George White, Assistant Director, Community Development
Anne Windsor, Administrative Secretary

ROLL CALL:
PLEDGE OF ALLEGIANCE:
APPROVAL OF MINUTES: Minutes of March 11, 2003 were approved as amended. M/S Dargie/Asselmeier, 4-0.
PUBLIC COMMENT: None
DIRECTOR'S REPORT: None
COMMISSIONER'S REPORT: Chair Barrett and Commissioner McAllister attended the 2003 Planners Institute Conference.
CORRESPONDENCE: None
APPEAL STATEMENT: Was read.
LEGAL RECOURSE STATEMENT: Was noted on the agenda.

Public hearing began: @ 7:00

NEW BUSINESS:
PUBLIC HEARING:

I. DRAFT CENTRAL PETALUMA SPECIFIC PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR).

A. Review, comment and recommendation to City Council on DEIR.

PC

B. Review, comment and recommendation to City Council on Draft Central Petaluma Specific Plan.

Mike Moore, Community Development Director: Asked the Commission to review, comment and make recommendations on the DEIR and the Central Petaluma Specific Plan.

John Wagstaff, Wagstaff & Associates: Presented the DEIR for the Central Petaluma Specific Plan.

Chair Barrett: Have specific mitigations highlighted for Cultural Historical resources and for Transportation impacts which are considered significant and unavoidable, do not have for air quality.

John Wagstaff: Highlighted the above because they are a specific concern. For air quality we do identify significant local and regional impacts related mostly to traffic – traffic mitigations would reduce air quality locally, however, regionally it will trigger threshold of significance.

Commissioner Asselmeier: Asked for explanation of development scenario related to the proposed 25% cap and how it relates and why there is an additional column for development potential.

John Wagstaff: Mixed use designations provides for maxmum future flexibility to encourage mixed use, smart growth applications. If the entire envelope is built out, it would exceed your objectives. So, as a result, a cap is formulated – 25% on residential and 25% on commercial. The EIR addresses the implications of those caps.

Commissioner Asselmeier: Did the 25% cap come from the Advisory committee?

Mike Moore: Yes.

Commissioner Asselmeier: If a historic building is proposed to be demolished, would additional EIR be done?

John Wagstaff: Any demolition of a historic resource, is a significant impact and requires preparation of an EIR. The EIR may not prevent demolition, it will identify why it is historic, what the value is and will suggest alternatives to demolition.

Commissioner Asselmeier: That would then apply to the 66 potential resources and anything that is already deemed historically significant? What is the body of other resources that remain and do not fit the definition of potentially historical.

John Wagstaff: It used to be quite substantial in downtown Petaluma. When the EIR was done for the redevelopment plan, it was obvious that there were buildings that had not been listed officially. As a result, the study was done by Carey & Co. and now you

PC

have a thorough listing and a recommended extension of the historic district. That is the principal basis.

Commissioner Dargie: If an EIR is tiered on this one regarding a historic building, why would this EIR not suffice.

John Wagstaff: If a building is being demolished, this will not suffice because that particular action is a significant impact under CEQA. If we knew now all of the specific sites that might be demolished and identify them in this EIR and address the environmental implications of that then this EIR would cover it. Described in Mitigation 7.2.

Commissioner Asselmeier: Can you address how the role of SPARC might be changing based on the adoption of the Specific Plan and the SMART code, and how it may or won't change based on the new process we will be embarking on.

Mike Moore: Would like the Commission to focus on the EIR first and then come back to the plan.

Chair Barrett: Appreciate the thoroughness and the alternatives section. Concerns are traffic, historical resources and air quality which seem to be unmitigatible areas. Role of SPARC will be relied on to make sure mitigations are put in place. If SMART code will limit SPARC's purview, need to look at this associated with the EIR.

Mike Moore: Section 7 of SMART code has a process for identifying historic properties and also provisions for addressing modifications or demolition. The plan is intended to update current zoning regulations. To that extent, SPARC's role will not change, particularly historic SPARC compared to current regulations. If someone came forward to establish a new district or expand an exsiting district that covered a portion of the specific plan area, that would be reviewed by historic SPARC. If there was a proposal to alter or demolish a historic building, that would be also be reviewed by SPARC.

Chair Barrett: When we talk abut potentially historic resources - who determines what is historic?

Mike Moore: There are criteria. Part of our normal process now if we have an application that affects a structure that is potentially historic, we do a historic analysis or use a consultant to do the analysis.. If the application is processed administratively, staff would make the determination or it requires review by historic SPARC then historic SPARC would make that determination.

Chair Barrett: The procedures are already in place and will remain in place even with the SMART code in place.

PC

Katherine Rinehart: Have concerns regarding historic resources, particularly about resources that were not considered historic. Presented inconsistencies in writing. PC.01

Jane Hamilton: Co-chair of CPSP Committee. Plan represents many hours of work and thinking – was a very inclusive process. Concerned about how the Commission's discussion takes place. Can the CPSP committee contribute to the discussion?

Chair Barrett: If the Commission cannot come to conclusion, will look to the Committee for assistance.

Diane Reilly Torres, Rainier Avenue: Public utilities was not adequately covered, pg. 3-21, 3.6.6. No cable services in portions of the CPSP – think this is important. Presented a document re: PUC. PC.02

John Wagstaff: Regarding demolition and looking at mitigation language, a demolition will reside in a statement of overriding consideration – could occur without an EIR.

Chair Barrett: Asked if a historic building could be demolished if there were statements of overriding considerations. PC.03

John Wagstaff: Need to look into this.

Mike Healy, 304 Kentucky: Referred to Table 2-1, is traffic analysis enforced for the total specific plan area or each individual sub area?

Matthew Ridgeway: Assumed that mix of uses is consistent with downtown Petaluma and spread them evenly. The totals are ok for the Specific Plan area, however, how it is allocated within the specific plan and if the assumptions do not agree with what comes forward in terms of development proposals, you may need to revisit on a site by site basis.

Mike Healy: How would the city know if they need to be revisited?

Matthew Ridgeway: The assumptions are laid out clearly and are in the new traffic model so when a proposal comes forward, we would check it against the assumption that was made for that site and then make a determination if the impact would be greater or lesser.

Chair Barrett: Variations could be within the specific plan, but the implications for traffic outside the specific plan would be same, and the variations would happen at different spots within the plan.

Matthew Ridgeway: Yes

Mike Healy: Is a 25% cap proposed to be enforced within each sub area, or is it a 25% cap overall.

PC

Mike Moore: Came up with something for the entire area, could be fluctuations in each sub area.

Public comment closed:

Commission discussion:

Commissioner Imm: General question on mitigations, when and how they get triggered? Who makes determination?

John Wagstaff: EIR does not specify thresholds of development increments when certain mitigations should be in place. Have taken a cross section at 2020 and indicated what the impact scenario would be then and the EIR describes what mitigations need to be in place by 2020 – do not specify the phasing. Regarding traffic, to implement mitigations, there will be traffic fees that addresses development as it occurs.

Commissioner Imm: If in 19 years we are built out within 1% of the plan and still do not have mitigations in place, is that ok?

John Wagstaff: For traffic there is a fair share mechanism in place.

Commissioner Imm: The plan would not be halted if the mitigations were not put in?

John Wagstaff: Have to prepare a mitigation implementation program that will be included in the final EIR.

Commissioner Imm: So there will be a schedule?

John Wagstaff: Yes, however, not in the EIR. The schedule is inherent in capital improvements programs.

Chair Barrett: Are road diets put in as a capital improvement program?

Mike Moore: Road diet proposal is part of the recommendations of the specific Plan and the EIR traffic analysis looked at one of the scenarios that included the road diet so if plan is adopted with the road diets included, it will be done through a capital improvement program.

Commissioner Asselmeier: If demolition is not approved and you have lost an important resource, can fines and penalties be enforced as a mitigation measure?

John Wagstaff: If the Planning Commission wanted to adopt an ordinance regarding prohibiting demolishing historic resources, can be included as a question in the Final EIR.

PC

Commissioner Asselmeier: Regarding the Zoning map, section 2-10 – maximum height on Petaluma Boulevard South would be 3 stories – is this the only maximum heights. Shouldn't we have some maximum heights on the western side of the Petaluma river knowing that it is a goal to protect the view shed. Looking for reassurance – do we really want four stories on the river and does that encourage public access.

John Wagstaff: EIR assumed potential for maximum build out under existing zoning heights or the SMART code. Did not get into mitigation of building heights – defer to design guidelines in SMART code and SPARC review.

Chair Barrett: If sentiment of the Commission to restrict height on the west side of the river, can do after the Final EIR, with the zoning map as it stands.

John Wagstaff: Yes

David Keller: Clarified height on Water Street and Poultry Streets.

Commissioner Asselmeier: Does not seem to be access easements on the western side of the Petaluma river between D Street and McNear. Have small green areas designated as civic space. Some mitigation for new building construction will be to allow public access. Can we ask applicants for public access along the fronts of these buildings.

Mike Moore: Yes, the Specific Plan and River Enhancement plan specifically asks for this.

Chair Barrett: When discussing architectural guidelines, are these from Wayne Miller.

Mike Moore: The reference is to provisions in the SMART code, however, as a comment to the EIR we can made reference to the architectural guidelines in Chapter 4 which will be included in the final Plan.

Commissioner Asselmeier: What happens when we have the new General Plan. Will there be an opportunity to revisit the specific plan, will that come back for this body?

Mike Moore: You will have that opportunity when you have the draft General Plan. If the specific plan is adopted, the general plan land use map will reflect the land uses adopted by the Specific Plan and will incorporate policies that need to be in that document that are already in the specific plan and if something comes to light, you will have the opportunity to look at that.

Commissioner Asselmeier: Pg. 11-13, Mitigation 11-2, some mitigations use shall, back and forth between shall and should. Should they all be using "shall" in all cases unless except unreasonable and infeasible language.

John Wagstaff: If it is changed to shall, under CEQA you are required to do these things and some will have significant financial impacts. Even if you use shall will still have unavoidable air quality. Is intended to be discretionary.

PC

Commissioner Barrett: Mitigation 13-4, concerns about 6 stories where there have been no buildings previously. This is different soil in this area, suggest the language could include, "but are not limited to". PC, 04

Commissioner Asselmeier: Pg. 12-9, why would there be no increased threat of flooding with significant development on the river?

John Wagstaff: Does not supercede ordinances in place regarding flooding. CPSP does not permit development that is not compliant with these ordinances.

John Fitzgerald: Has been covered in great detail.

David Keller: No flooding impact downstream of the CPSP.

Commissioner Barrett: Historic preservation – have concerns particularly regarding the Northwest Information Center. PC, 05

John Wagstaff: Want to assure you that they are in the loop.

Commissioner Barrett: Think there are more than 66 historic properties, would like to point out to SPARC concerns regarding overriding considerations.

Mike Moore: Can bring this issue to SPARC.

Commissioner Barrett: Want SPARC to be aware of the discrepancies in the number of historic properties.

Mike Moore: Will investigate the discrepancy of the numbers. There may be more historic resources identified at some future time.

Commissioner Asselmeier, Pg. 8-19: Noting last paragraph – 25 acres of park land that can be developed – is on the eastern side of the river – can smaller areas be created on the west side. PC, 06

M/S. Asselmeier/Dargie to recommend final EIR be prepared and recommend that it be certified by the City Council.

All in favor:

Commissioner Dargie:	Yes
Chair Barrett:	Yes
Commissioner Asselmeier:	Yes
Commissioner Imm:	Yes

PC

Questions/Comments on the Draft EIR for the CPSP 25
City of Petaluma Planning Commission Meeting – Tuesday, March 21, 2003

Katherine J. Rinehart, MA
Historian
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Petaluma, CA 94953
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I would first like to acknowledge that I have limited experience reviewing the types of environmental documents you have before you tonight and I admit that I had a difficult time understanding much of what is written in the Draft EIR for the Central Petaluma Specific Plan. Nonetheless after many hours of reading I have come away with the impression that neither the EIR nor the Central Petaluma Specific Plan as currently written do much in the way of protecting historic resources, nor does either document appear to provide much in the way of identification of potential historic resources located within the Central Petaluma Specific Plan project area. The identification efforts as presented in both documents are confusing and incomplete. PC.07

Here are just some of my concerns as they relate specifically to the draft EIR.

The Draft EIR provides:

- **Inconsistent information as it relates to the CPSP**

  Examples:

  Pg. 7-2 in Paragraph 7.1.2 it states that, "In addition, the historic resources evaluation identified 20 properties that appear to merit a local interest status, and ***one additional area that has the potential to be a locally designated historic district.***" This conflicts with the CPSP, which states that ***two potential local historic districts*** exist within the Specific Plan area. PC.08

  Pg. 7-7 Impact 7-2 - it states that the significance of the designated Petaluma Historic Commercial District or local historic districts ***created*** under the Specific Plan. The Specific Plan only ***recommends*** the creation of two historic districts. The Plan provides no mechanism for actually establishing these districts. PC.09

- **Incorrect information**

  Examples:

  Pg. 7-3 (c) Riverfront Warehouse Subarea states that: "prominent historic resources identified in this subarea include the A.W. Horwege Saddle Tree Factory building, the Centennial Planning Mill and Box Factory building, PC.10

PC

the Petaluma Fruit Canning Company building, the Sonoma Preserve Company building, the Corliss Gas Engine building and the Petaluma Box Factory and Foundry building. With the exception of the Corliss Gas Engine Company and a portion of the Foundry none of these buildings exist. They were businesses located within the boundaries of the Riverfront Warehouse District during the 19th and early 20th Century that early on defined this neighborhood as a manufacturing district.

Pg. 7-7 (a) Specific Plan Provisions for Historic Resources – in this section it states that the Proposed Specific Plan **provides** for this district expansion (referring to expansion of the Downtown National Register District), along with creation of two local historic districts and recognition of individual historic resources. This implies that the Plan as written will assure that these things will occur when in fact the Plan does not. The Plan only makes recommendations. PC.11

- **Other Items of Concern**

1. The Plan discusses historic resources as though the term only applies to historic buildings when in fact the legal definition of historic resources defined by CEQA includes archaeological resources as well (Public Resources Code 5020.1). PC.12

2. The evaluation of potentially significant historic buildings was conducted by way of a windshield survey based on National Register Criteria. How can a windshield survey adequately identify and evaluate all potentially significant historic resources within a 400-acre project area? PC.13

3. According to the CPSP and the EIR, National Register criteria was used to determine significance of historic resources. According to Public Resources Code SS5024.1, Title 14 CCR, Section 4852) a resource is generally considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register of Historical Resources. Why then did the historic resources survey rely solely on National Register criteria? PC.14

4. The EIR states that on page 7-8 its intended purpose is to streamline the review process for future projects. However, as written the EIR proposes that much of the evaluation required to determine impact be done on a project-by-project basis at a future time. By putting off the identification and evaluation until a later date, the EIR is not providing a streamlined approach to how cultural resources are to be dealt with and I believe does not meet its (the EIRs) obligation under CEQA to identify impacts up front. By treating historic properties on a case-by-case basis you are not addressing the whole historic district concept that is presented in the Plan which states that although an individual property on its own may not be PC.15 PC.16

PC

significant, it could be a contributor to a district. Treating historic properties on a case-by-case basis will put anybody reviewing a development proposal in the unfortunate position of weighing a proposed project against the value of a historic resource, which should not occur. A historic resource is significant because it's significant.

5. The EIR specifies that information for Chapter 7 was obtained from the NWIC. The NWIC is part of the California Historical Resources Information System, which works in partnership with the California State Office of Historic Preservation. The NWIC provides historical resources information to local governments and individuals with responsibilities under the National Environmental Policy Act (NEPA), NHPA (National Historic Preservation Act), and California Environmental Quality Act (CEQA). PC.17

   I phoned the NWIC and asked if they had been given an opportunity to review this version of the Draft EIR. They had not. As a concerned citizen I faxed them Chapter 7. I have attached their comments. Should you require something more official, Leigh Jordan the director of NWIC would be happy to draft a letter or the like at your request.

ADDITIONAL QUESTIONS AND COMMENTS:

Pg. 7-1

Reference made to Petaluma Specific Plan Draft Historic Resource Evaluation dated October 2001. Where is this document? Was a final "draft" ever prepared? The Plan itself only makes reference to a windshield survey and general data gathering. PC.18

Pg. 7-2

The EIR states that Carey & Company identified 66 potentially significant properties within the proposed Specific Plan area boundary, including 3 already designated as city historic landmarks. It is unclear when looking at the CPSP which 66 resources the EIR is referring to. For clarification the EIR should provide an address list of all resources that are potentially significant that then can be compared with the CPSP for consistency. This must take into consideration that the current lists included in the CPSP are incomplete and needs to be expanded (see comments related specifically to the CPSP made at the March 11, 2003 Planning Commission meeting). PC.19

Pg. 7-3

The paragraph on the Turning Basin Subarea states that the "prominent historic resources identified in this subarea include the San Francisco and Northern Pacific Railroad, Petaluma and Santa Rosa Railroad and the Petaluma depot." Do the authors of the EIR mean the train tracks associated with the San Francisco and Northern Pacific Railroad and the Petaluma and Santa Rosa Railroad? If so, it needs to be specified and notation made that part of the Petaluma and Santa Rosa Railroad tracks were taken up after the P & SR Carbarns burned down. PC.20

PC

It should also be made clear that when referring to the Petaluma Depot they mean the Northwestern Pacific Railroad Depot buildings (there are 3). The only building associated with the Petaluma and Santa Rosa Railroad is the former ticket office currently located on Weller Street. PC.21

In the paragraph that talks about the Riverfront Warehouse Subarea there needs to be a list of the potentially significant historic resources that were identified in the historic resources survey that presumably exists. PC.22

This same section states that: "prominent historic resources identified in this subarea include the A.W. Horwege Saddle Tree Factory building, the Centennial Planning Mill and Box Factory building, the Petaluma Fruit Canning Company building, the Sonoma Preserve Company building, the Corliss Gas Engine building and the Petaluma Box Factory and Foundry building. With the exception of the Corliss Gas Engine Company and a portion of the Foundry none of these buildings exist. They were businesses located within the boundaries of the Riverfront Warehouse District during the 19th and early 20th Century that defined the neighborhood as a manufacturing district. PC.23

The Saddle Tree Factory and the Centennial Planning Mill were once located on the corner of D and First Street on the approximate site of what today is River Town Feed. PC.24

The Petaluma Fruit Canning Company was on the east side of First Street at the corner of F Street. Later it became the site of the Heyneman and Company Overall Factory. Now it is a vacant lot used for parking. PC.25

Sonoma Preserve was located on 2nd Street at the foot of B Street – now the site of a parking lot that is being developed by Basin Street Properties. PC.26

The Petaluma Box Factory was located on 2nd Street behind what we know today as the parking lot of the Foundry Wharf. PC.27

The paragraph that addresses the Lower Reach Subarea states that there are three potentially significant historic resources. The EIR should specify that when they say the San Francisco and Northern Pacific railroad they mean the tracks associated with the Northwestern Pacific Railroad. PC.28

Pg. 7-7

(a) Specific Plan Provisions for Historic Resources. This paragraph states that the Carey & Company historic resources survey has applied rules set forth in the CEQA for determining potentially significant resources. PC.29

Two issues here:

PC

- According to the Plan, Carey & Company used National Register criteria to evaluate significance. Typically CEQA projects require that the California Register criteria be used.

- The Plan also states that these evaluations were developed through a windshield survey – not an in depth analysis and that further research is needed. How can an evaluation be made when it is acknowledged that further research is needed?

Pg. 7-7

PC.30

The EIR states that : "In addition, the historic resources survey report recommends extension of the existing Petaluma Historic Commerical District and designation to encompass a local historic area in the Riverfront Warehouse Subarea that contains a collection of buildings that are not necessarily individually significant, but form an environment which is distinguished by its continuity, setting, urban design features and integrity."

This wording is confusing. 1) The Plan recommends that additional research be conducted and a nomination for city designation be prepared. 2) This sentence neglects to mention the North River Subarea that the Plan also recognizes as an area that may qualify as an historic district.

Responses to Comments Made on the Draft EIR at the Petaluma Planning Commission Regular Meeting of March 25, 2003

Katherine J. Rinehart, MA, Historian, Petaluma

Comment PC.01: Concerns regarding Draft EIR information and findings pertaining to historic resources. Submitted detailed comments in writing, which are summarized herein--see comments PC.07 through PC.30.

> Response: Please see responses in this Final EIR to comments PC.07 through PC.30 from Ms. Rinehart.

Diane Reilly Torres, Rainier Avenue, Petaluma

Comment PC.02: Public utilities not adequately covered in section 3.6.6 on page 3-21 of Draft EIR. No TV cable service is provided in portions of the Specific Plan area; important.

> Response: The Draft EIR section cited in this comment (section 3.6.6, Utilities and Public Services) is not part of the public services impact evaluation; rather, it is a part of chapter 3, the Project Description, and is intentionally limited to a description of the proposed utilities and public services improvement aspects of the proposed Specific Plan (e.g., the plan-proposed *Phasing Plan* for public utilities improvements, the plan-proposed criteria for identifying utilities system improvement priorities, plan policies relevant to provision of water, sewer, storm drainage and joint trench utilities, etc.). The intent of a Specific Plan is to identify those specific infrastructure needs that will require special public and private funding arrangements to implement these infrastructure needs. Cable TV provisions, similar to telephone services, represent a private "enterprise" service entirely funded by user fees, and are therefore not addressed in the Specific Plan. Similarly, the impact discussion later in Draft EIR--i.e., in chapter 8, Public Services and Utilities--focuses on identifying the potential impacts of the Specific Plan on the demand for public services and utilities, and environmental impacts associated with providing these services. Television cable services are typically provided via existing pole lines and underground conduit systems, and do not entail substantial new construction and associated environmental (physical) impacts.

Commission Chair Barrett

Comment PC.03: If a statement of overriding considerations were adopted by the City for historic resources impacts, could a historic building be demolished with no additional CEQA compliance requirements.

> Response: The answer to the question posed in this and similar comments (see comment SP.03)--will City adoption of such a Statement of Overriding Considerations for this particular impact finding (Impact and Mitigation 7-2) mean that a historic building

could be demolished in the Specific Plan area with no additional CEQA compliance requirements--is **no**.

A number of comments made on the Draft EIR pertain to the issue of Draft EIR-identified historic resources impacts and the associated Draft EIR-identified Mitigation 7-1, which states that, for "any future discretionary action that would result in the demolition of an HRS-identified historic resource or otherwise cause the significance of the resource to be 'materially impaired,'" the City may determine that there are no available mitigations to reduce the potential effects of such a proposed building demolition action to a less-than-significant level (other than no building demolition action), and thus, "the potential for building demolition and resulting effects on historic resources and/or historic districts would represent a ***significant, unavoidable adverse impact***."

Under CEQA, approval of a project (in this case, the proposed Specific Plan) for which a "significant, unavoidable adverse impact" has been identified during the CEQA process, requires lead agency (in this case, the City) adoption of a so-called "Statement of Overriding Considerations" (CEQA Guidelines section 15093). The Statement of Overriding Considerations must state the overriding economic, legal, social, technological, or other benefits of the proposed project which the lead agency has determined will override (outweigh) the unavoidable adverse impacts and make these adverse environmental effects "acceptable."

In a 1997 decision, the State Court of Appeals held that, under CEQA, demolition of an identified historic structure was, in and of itself, a substantial and unavoidable significant environmental impact. Also, the CEQA Statutes and Guidelines have been recently clarified and expanded with respect to historic resources definition, historic resources impacts, and in particular demolition of historic resources. Under Public Resources Code section 21084.1, projects that may cause a substantial change in the significance of a historic resource are considered to be projects that may have a significant effect on the environmental. When a project may cause a substantial adverse change for which adequate mitigation for the adverse change has not been identified, the lead agency must prepare an EIR. In particular, where a historic resource is proposed for demolition, the Lead Agency must determine through the CEQA-required Initial Study process that the resulting potential for a significant impact is unavoidable, thereby requiring preparation of a project-specific EIR [CEQA Guidelines section 15064.5(a) and (b)].

In response to this and similar comments, revisions have been made to the description of Impact 7-2 and Mitigation 7-2 (see revisions to Draft EIR, pages 7-7 through 7-9, in section 3 herein, Revisions to the Draft EIR), including a revision to the Mitigation 7-2 language. Mitigation 7-2 now indicates more clearly that the mitigation measures identified here for future actions within the Specific Plan area that may cause a "substantial adverse change" to one or more potentially significant historic resources--i.e., application of the cited Secretary of Interior standards--would not be sufficient to

reduce the resulting historic resources effects to a less-than-significant level if and where demolition of the resource is proposed, thereby requiring preparation of project-specific EIR.

Comment PC.04: Change suggested for Draft EIR Mitigation 13-4 regarding expansive soil impacts: language should include, "but not limited to."

Response: Comment acknowledged. This revision has been incorporated into the Final EIR. Please see revision to page 13-11, Mitigation 13-4, in section 3 herein (Revisions to the Draft EIR).

Comment PC.05: Concern expressed regarding adequate Draft EIR consultation/coordination with the Northwest Information Center for cultural/historic resources section.

Response: The NWIC was contacted, and information was obtained from the Center during the Specific Plan preparation process, as indicated on page 7-1 of the Draft EIR (see footnote 1). In addition, the Draft EIR was submitted to the NWIC for their review, and the Center's subsequent comments on the Draft EIR are identified herein (see Comment #2), and corresponding edits have been made to Draft EIR pages 7-2, 7-5, and 7-6 (see revised versions of these pages in section 3 herein, Revisions to the Draft EIR). One editorial suggestion by the NWIC for the title of Impact 7-2 on Draft EIR page 7-7 has not been incorporated into the Final EIR for the reasons described in the responses to Comment #2 herein.

Commissioner Asselmeier

Comment PC.06: Question regarding possibility of smaller park areas being developed on western side of the river.

Response: The comment pertains to the content of the Specific Plan rather than to the adequacy of the Draft EIR. No impact findings were identified in section 8.7 (Parks and Recreation) of the Draft EIR that warranted identification of such west-side park provisions as a mitigation need.

Katherine J. Rinehart, M.A., Historian, P.O. Box 113, Petaluma

Comment PC.07: Neither the Draft EIR nor the Draft Specific Plan includes adequate protection or identification of historic resources in the Specific Plan area. Identification presented in both documents is confusing and incomplete.

Response: Ms. Rinehart's concerns regarding the adequacy of the Draft EIR with respect to the protection and identification of historic resources are more specifically detailed in her subsequent more specific comments. Please see corresponding comments and responses PC.08 through PC.30 which follow.

Comment PC.08: Language on Draft EIR page 7-2 regarding number of historic districts in planning area is in conflict with Specific Plan.

> Response: Comment acknowledged. Draft EIR page 7-2 has been revised in response to this comment to indicate that two, not one, additional areas have been identified as having the potential to become locally-designated historic districts. Please see these revisions to Draft EIR page 7-2 in section 3 herein (Revisions to the Draft EIR).

Comment PC.09: Draft EIR refers on page 7-7 under Impact 7-2 to historic districts "created" under Specific Plan; Specific Plan only recommends creation of two historic districts.

> Response: In response to this comment, the language on Draft EIR page 7-7 under Impact 7-2 has been changed from, "...local historic districts created under the Specific Plan" to "...local historic districts recommended by the Specific Plan." Please see this revision to Draft EIR page 7-7 in section 3 herein (Revisions to the Draft EIR). The Draft EIR does properly and correctly state earlier in this paragraph that "The Specific Plan (Historic Resources chapter) contains policies for recognizing historic resources, expanding the Petaluma Historic Commercial District, creating two local historic districts, and conducting additional historical research."

Comment PC.10: Draft EIR on page 7-3 under subsection (c) refers to business in area that no longer exist.

> Response: Following common historic resources survey practice, these properties are referred to in the Draft EIR text by their historic business occupants, although most or all of these businesses no longer occupy the structures. In response to this comment, a clarification has been added to the text on Draft EIR page 7-3 in section 3 herein (Revisions to the Draft EIR).

Comment PC.11: Draft EIR page 7-7 under subsection (a) states that proposed Specific Plan "provides" for historic district expansion, implying that Plan as written will assure that this will occur when in fact Plan only makes recommendations.

> Response: In response to this comment, the Draft EIR text here (last paragraph on page 7-7) has been changed from "The proposed Specific Plan provides for this district expansion..." to "The proposed Specific Plan includes policies calling for this district expansion..." Please see the revisions to page 7-7 in section 3 herein (Revisions to the Draft EIR).

Comment PC.12: Plan discusses historic resources as through term only applies to buildings; legal definition under CEQA includes archaeological resources as well (Public Resources Code 5020.1).

Response: Comment acknowledged. CEQA Guidelines section 15064.5(c) states that CEQA applies to effects on archaeological sites. The Draft EIR includes an adequate discussion of potential project (Specific Plan) impacts on archaeological sites (see sections 7.1.1 and 7.3.2, Impact and Mitigation 7-1). Nevertheless, in response to this and related comments, a new section (a) has been added to Draft EIR page 7-2 entitled, "CEQA Definitions of Historic Resources," which includes an indication that the definition includes archaeological sites. Please see the revisions to page 7-2 included in section 3 herein (Revisions to the Draft EIR).

Comment PC.13: Historic buildings evaluation limited to windshield survey based on National Register Criteria; how can windshield survey adequately identify and evaluate all potentially significant historic resources in 400-acre project area?

Response: The comment is acknowledged. A windshield survey cannot adequately identify and evaluate all potentially significant historic resources in the plan area. In response to this and similar valid comments, the Draft EIR text has been revised to clarify that the Carey & Co. *Historic Resource Evaluations* report cited in the Draft EIR (referenced in this letter as the "windshield" survey) does not, and is not intended to, meet Public Resources Code criteria for a full "Historic Resources Survey," but rather has been completed as a preliminary survey and identification of potential historic resources in the proposed Specific Plan area to provide the preliminary historic resources information necessary to prepare the Specific Plan and the Specific Plan EIR. In response to this and similar comments, the Draft EIR text has been revised to state that:

"The Carey & Co. evaluation was not designed or intended to provide a "local register of historic resources" as defined in Public Resources Code section 5020.1(k) or to meet the more extensive full "historic resources survey" criteria described in Public Resources Code section 15024.1(g). Rather, the evaluation was intended to provide preliminary historic resource information for planning purposes and for assisting the EIR authors in identifying potentials for historic resources impacts."

Also, other revisions have been made to this EIR chapter to clarify that other buildings, structures, sites, areas and places, in addition to those identified in the Carey & Co. evaluation that may also be significant historic resources, may be impacted by the Specific Plan. Please see revisions to Draft EIR pages 7-2, 7-7, 7-8, and 7-9 in section 3 herein (Revisions to the Draft EIR).

Comment PC.14: According to Specific Plan and Draft EIR, National Register Criteria used to determine significance of historic resources. Public Resources code section 5024.1, Title 14, CCR, section 4852, cites criteria for listing in the California Register of Historic Resources. Why did historic resources survey rely solely on National Register criteria?

Response: The Carey & Co. evaluation was intended to provide a preliminary survey of potential historic resources, using National Register criteria as appropriate criteria for

such preliminary resource identification purposes. The evaluation was not intended to provide a formal local listing of historic resources. Please see response to comment PC.13 and revisions to Draft EIR pages 7-2, 7-7, 7-8, and 7-9 in section 3 herein (Revisions to the Draft EIR) which have been made to provide the necessary clarification in response to this and similar comments.

Comment PC.15: Draft EIR states on page 7-8 that purpose is to streamline review process for future projects. However, as written, Draft EIR proposes that much of impact evaluation be done on a project-by-project basis at a future time. By putting off evaluation to later date, EIR is not achieving streamlined approach for cultural resources and does not meet obligation under CEQA to identify impacts up front.

Response: Comment acknowledged. The Specific Plan EIR should not be worded in a manner that allows the perception that future site-specific actions resulting in the demolition of a CEQA-defined historic resource, or otherwise cause the significance of the resource to be "materially impaired," would be allowable with no future CEQA compliance requirement.

The intent of the Draft EIR under Mitigation 7-2, last paragraph, was to prevent such an action without preparation of a project-specific EIR. However, as this and similar comments received have indicated, the language here and the language on Draft EIR page 7-8 was ambiguous and confusing to readers in this regard. In response, the text on Draft EIR pages 7-8 and 7-9 (last paragraph of Mitigation 7-2) has been revised to clarify that:

"For any future discretionary action permitted under the Specific Plan that would result in the demolition of a CEQA-defined historic resource, or otherwise cause the significance of the resource to be 'materially impaired,' the City must determine through the Initial Study process for that action that the above mitigation measures will not be adequate under CEQA, i.e., will not reduce the effects of the demolition to a less-than-significant level, and the resulting potential for a significant impact is unavoidable, thereby requiring a project-specific EIR. [CEQA Guidelines section 15064.5(a) and (b)]. The Specific Plan-related potential for building demolition and resulting effects on historic resources and/or historic districts would therefore also represent a significant, unavoidable impact."

Also, in response to this and similar comments, the language on Draft EIR page 7-8, suggesting that this Specific Plan EIR may fully meet the historic resources related environmental documentation requirements under CEQA for use in approving future site-specific projects that involve demolition of a CEQA-defined historic resource, has been deleted. Please see these revisions to Draft EIR page 7-8 in section 3 herein (Revisions to the Draft EIR).

Comment PC.16: By treating historic properties on a case-by-case basis, Draft EIR is not addressing whole historic district concept presented in Specific Plan, which states that

although individual property on its own may not be significant, it could contribute to a significant district. Treating historic resources on a case-by-case basis not adequate.

> Response: The Draft EIR intent has been to address the potential Specific Plan impacts on any object, building, site, or place which the City determines to be historically significant, supported by substantial evidence (see associated clarification added to page 7-7 of the Draft EIR in section 3 herein, Revisions to the Draft EIR). Also, the language under the key impact finding regarding potential impacts on historic resources (Impact 7-2 on Draft EIR page 7-7) includes the phrase "...one or more such resources, such that the resource and/or historic district in which it is located..."
>
> The Draft EIR, with the revisions made in response to this and other comments, clearly meets basic CEQA requirements pertaining to proper determination of impacts on historic resources (CEQA Guidelines section 15064.5).

Comment PC.17: Draft EIR states that information for Chapter 7 (Cultural and Historic Resources) was obtained from the Northwest Information Center (NWIC). NWIC states that they have not been given opportunity to review Draft EIR. Their comments are attached. [See comment #2 herein from NWIC and associated responses.]

> Response: The NWIC was contacted and consulted by Carey & Co. during its preparation of the Specific Plan area preliminary historic resources evaluation, for both Specific Plan and Specific Plan EIR preparation purposes (see Draft EIR page 7-1, footnote 2). In addition, minor edits to the Draft EIR suggested by the NWIC have been incorporated (see responses to comment 2.01 herein).

Comment PC.18: Draft EIR page 7-1 refers to October 2001 Petaluma Specific Plan Draft Historic Resource Evaluation. Where is this document? Was final Draft ever prepared? Plan itself only refers to windshield survey and general data gathering.

> Response: The Carey & Co. prepared Petaluma Specific Plan Draft Historic Resources Evaluation report has been incorporated almost verbatim into the draft Specific Plan as chapter 9, "Historic Preservation, Historic Resources Survey and National Register Status Codes."

Comment PC.19: Draft EIR page 7-2 refers to Carey & Co. identification of 66 potentially significant properties within Specific Plan area. Draft EIR should provide list of addresses of all identified resources for comparison with Specific Plan "for consistency." Must also take into consideration that current lists included in Specific Plan are incomplete and need to be expanded. (Commenter refers to specific comments made in this regard at March 11, 2003 Planning Commission meeting on Specific Plan).

> Response: The Carey & Co. report, which includes such detailed address information, is properly cited in the Draft EIR, and has been incorporated into the Specific Plan as chapter 9. In response to this and similar comments, revisions have been made to the

Draft EIR text to clarify that the Carey & Co. evaluation report is intended to be preliminary for Specific Plan and Specific Plan EIR formulation purposes, and does not constitute a formal local listing of historic resources or formal historic resources survey, either of which the City may elect to complete in the future.

Comment PC.20: Draft EIR page 7-3 refers to "San Francisco and Northern Pacific Railroad, Petaluma and Santa Rosa Railroad and Petaluma Depot." Does this mean train tracks associated these railroads? If so, Draft EIR should note that part of Petaluma and Santa Rosa tracks were taken up after the Petaluma and Santa Rosa Railroad car barns burnt down.

Response: In response to this comment, the text on page 7-3 has been revised to read "...include vestiges of the San Francisco and Northern Pacific Railroad..." See this revision to page 7-3 in section 3 herein (Revisions to the Draft EIR).

Comment PC.21: Draft EIR references to Petaluma Railroad should be clarified to indicate that this means the Northwestern Pacific Railroad Depot buildings (three). The only existing building associated with the Petaluma and Santa Rosa Railroad is the former ticket office currently located on Weller Street.

Response: Comment acknowledged. In response, clarification has been added (see revisions to page 7-3 in section 3 herein, Revisions to the Draft EIR).

Comment PC.22: Draft EIR page 7-3 includes a paragraph on the Riverfront Warehouse Subarea. There needs to be alist of potentially significant resources identified here in the historic resources survey, that a list presumedly exists.

Response: The Draft EIR includes adequate reference to the preliminary data source (the Carey & Co. report) for this paragraph. Please see responses to comments PC.18 and PC.19.

Comment PC.23: Draft EIR page 7-3 refers to a number of buildings identified in this subarea. With exception of the Corliss Gas Engine Company and a portion of the Foundry, none of these buildings exist; they were located within the Riverfront Warehouse District during the 19th and early 20th centuries.

Response: Comment acknowledged. Please see edits to this paragraph and clarifications added at the end of this paragraph in response to this comment, in section 3 herein (Revisions to the Draft EIR).

Comment PC.24: The Saddle Tree Factory and Centennial Planing Mill were once located on the corner of D and First Street on the approximate site of what today is River Town Feed.

Response: Comment acknowledged. Please see response to comment PC.23.

Comment PC.25: The Petaluma Fruit Canning Company was on the east side of First Street at the corner of F Street. Later it became the site of the Heyneman and Company Overall Factory. The property is now vacant and used for parking.

Response: Comment acknowledged. Please see response to comment PC.23.

Comment PC.26: The Sonoma Preserve Company was located on 2nd Street at the foot of B Street. Property is now a parking lot and is being developed by Basin Street Properties.

Response: Comment acknowledged. Please see response to comment PC.23.

Comment PC.27: Petaluma Box Factory was located on 2nd Street behind what is now parking lot for Foundry Wharf.

Response: Comment acknowledged. Please see response to comment PC.23.

Comment PC.28: Draft EIR page 7-3 paragraph on Lower Reach Subarea should specify that reference to San Francisco and Northern Pacific railroad pertains to tracks associated with the Northwestern Pacific Railroad.

Response: Comment acknowledged. In response, this sentence has been revised to include "...vestiges (sites) of..."

Comment PC.29: Draft EIR page 7-7, section (a), states that Cary & Co. survey applied rules set forth in CEQA for determining potentially significant resources. According to Plan, Carey & Co. used National Register criteria to evaluate significance. Typically, CEQA projects require use of California Register criteria. The Plan also states that these evaluations were developed based on a windshield survey, not on an in depth analysis, and further research is needed. How can evaluations be made when Draft EIR acknowledges that further research is needed?

Response: Please see responses to comments PC.13 and PC.14.

Comment PC.30: Draft EIR page 7-7 language re: recommended extension of Petaluma Historic Commercial District includes confusing wording. Plan recommends that additional research be conducted and a nomination for city designation be prepared. Sentence neglects to mention that Plan also recognizes North River Subarea may qualify as a historic district.

Response: The cited language on page 7-7 has been refined to eliminate confusion. The reference on page 7-7 to Specific Plan policies "for...creating two additional local historic districts" [the word additional has been added in response to this comment] is intended to include the North River area.

SP

City of Petaluma, CA
Site Plan and Architectural Review Committee

Draft Minutes

Regular Meeting
City Council Chambers
City Hall, 11 English Street

March 27, 2003
3:00 p.m.
Petaluma, CA

Telephone: 707-778-4301
FAX: 707-778-4498
E-Mail: cdd@ci.petaluma.ca.us
Web Page: http://www.ci.petaluma.ca.us

The Site Plan and Architectural Review Committee encourages applicants or their representatives to be available at the meeting to answer questions so that no agenda item need be deferred to a later date due to a lack of pertinent information.

Roll Call: Present: Teresa Barrett, Janet Gracyk, Chris Lynch, Jack Rittenhouse*
Historic: Marianne Hurley, Hoppy Hopkins

*Chairperson

Staff: George White, Assistant Director, Community Development
Irene Borba, Senior Planner
Anne Windsor, Administrative Secretary

Approval of Minutes: Minutes of March 13, 2003 were approved as amended. M/S–Rittenhouse/Barrett, 6-0.
Committee Members' Report: Katherine Rinehart submitted comments in writing.
Correspondence: None
Public Comment: None
Legal Resource Statement: Was noted on the agenda.
Appeal Statement: Was noted on the agenda

Public hearing began at 3:10 p.m.

HISTORIC & CULTURAL PRESERVATION COMMITTEE BUSINESS:
OLD BUSINESS:
PUBLIC HEARING:

I. DRAFT CENTRAL PETALUMA SPECIFIC PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR).

A. Review, comment and recommendation to City Council on DEIR.

B. Review, comment and recommendation to City Council on Draft Central Petaluma Specific Plan.

Mike Moore presented the DEIR and the draft CPSP and an overview of the process.

Public hearing opened:

Jane Hamilton: Co-chair of CPSP committee. Thanked the SPARC committee for the time spent reading and discussing the plan.

Chris Stevick, 20 Liberty Street: Regarding resource issues – difficult having two important issues discussed – would like clarity regarding the responsibility for changes to plan. Still has questions about the role of CEQA.

Mike Moore: Final certification of EIR and adoption of the CPSP is the role of the Council. The Planning Commission and SPARC are recommending bodies. If the council adopts the Plan, resolutions and ordinances for the CPSP will be voted on by the Council.

Katherine Rinehart: Submitted comments in writing. SP.01

Public hearing closed.

Committee comments on the DEIR:

Committee Member Hurley: Cultural and historic Chapter – need to decide whether a structure is a historic resource under the laws of the State so it comes under the purview of CEQA – if something is done that is negative, will it be a significant impact? CEQA looks at alternatives; DEIR abdicates that responsibility by statement of overriding considerations; EIR allows review of alternatives without EIR not enough detailed level of review; threat of EIR helps protect property. Committee should not recommend SOC for historic resources. Language reflects that a cultural survey has been done and it has identified significant resources, however, that has not been done. SP.02

Chair Rittenhouse: Council is being asked to adopt a SOC on the historic resources element – is only way around this to not certify the EIR? SP.03

George White: From a process standpoint the only way to go forward and do what Marianne suggests is to reduce that impact to a less than significant level and the only way to do that is to say all issues relative to demolition or alteration of historic resources would not be handled as part of this EIR but on a case by case basis which would lead to individual EIRs.

Committee Member Gracyk: Can't accept 25% cap – needs to be higher. Regarding traffic mitigations – 6-6, 6-7 not feasible. Resolve conflict regarding mitigations (visual impacts) relative to SMART code. More flexibility needed in site planning – clarify language SP.04 SP.05

Committee Member Barrett: Regarding historical resources section – recommend supporting no SOC adopted for historical resources. Support full EIR for demolition of historic resources. If council does SOC – demolition or alteration of a historic resource or potentially historic resource would require public hearing. SP.06

Committee Member Lynch: Historic resources – support Teresa's proposal regarding historic resources. Plan provides too many incentives to encourage demolition; threat of EIR thwarted demolition of Victory Chevrolet; 25% cap seems to low – address densities in plan to increase build out potential. SP.07

Chair Rittenhouse: Mitigations generally sufficient. Support public hearing on demolition of historic resources. SP.08

M/S Rittenhouse/Barrett to recommend that the City Council certify the EIR and keep public comment open until April 21, 2003. 6/0 SP.09

Discussion of CPSP.

Committee Member Lynch: What does mixed use mean as far as land use?

Mike Moore: Definition on pg. 21.

Committee Member Lynch: Pg. 19, Section 4 – list of definitions – does every building in mixed use district have to have a storefront?

Mike Moore: Read definition – mixed use "shall comply" with following requirements.

Committee Member Lynch: Live/work complies as a mixed use – project would have to show storefront?

Mike Moore: Yes.

Committee Member Lynch: Mixed use has to be defined better – if we allow six buildings in a row along the river to be an apartment block – that is counter to the new urbanist idea – will not be a pedestrian experience.

Mike Moore: If you look at the definition of shop front – it is not a use requirement, it a form requirement in the relationship of the building to the street. The question to the committee is do you want to be more specific than the plan is now and require that every building be mixed use.

Responses to Comments Made on the Draft EIR at the City of Petaluma Site Plan and Architectural Review Committee Meeting of March 27, 2003

Katherine J. Rinehart, MA, Historian, Petaluma

Comment SP.01: Referred to comments submitted in writing--i.e., comments PC.07 through PC.30 as coded, summarized, and responded to herein.

Response: Please see responses herein to comments PC.07 through PC.30.

Committee Member Hurley

Comment SP.02: With Statement of Overriding Considerations (SOC) for historic resources impacts, the EIR process for the plan would abdicate responsibility for addressing historic resources impacts--i.e., would permit future review of development alternatives involving impacts on historic resources without an EIR. The threat of an EIR helps protect historic resources. SPARC should not recommend SOC for historic purposes. Draft EIR indicates that a cultural survey has been done and has identified significant resources; however, this has not been done.

Response: Comment acknowledged. The CEQA Statutes and Guidelines provide an essential means for protection of historic resources in California. Please see response to similar comment PC.15 which describes how the language in the Draft EIR, especially Draft EIR pages 7-8 and 7-9, has been revised to eliminate any perception that future, site-specific actions resulting in the demolition of a CEQA-defined historic resource, or otherwise causing the significance of a historic resource to be "materially impaired," would be allowable under this Specific Plan EIR with no future CEQA compliance requirement. Mitigation 7-2 now specifically states that the effects of a future action including demolition of a historic resource cannot be reduced (mitigated) to a less-than-significant level, and that "the resulting potential for a significant adverse impact is unavoidable, thereby requires a project-specific EIR." Under CEQA, preparation of a project-specific EIR must include identification and comparative evaluation of mitigating alternatives to the proposed action.

Committee Chair Rittenhouse

Comment SP.03: Is only way to avoid adoption of Statement of Overriding Considerations for historic resources to not certify the EIR? (See staff response.)

Response: No. Certification of the EIR, especially with the revisions made to chapter 7 (Cultural and Historic Resources) in responses to comments PC.15 and SP.02, provide reasonable assurance that adoption of a Statement of Overriding Considerations for future potentially significant unavoidable impacts due to possible future demolition of historic resources in the Specific Plan area does not eliminate the requirement for a project-specific EIR if and when such circumstances may arise; rather, a project-specific

EIR would be requested in such instances because the impact will be unavoidable, and thus could not be addressed with a Mitigated Negative Declaration. Please also see responses to comments PC.15 and SP.02.

Committee Member Gracyk

Comment SP.04: Traffic Mitigations 6-6 and 6-7 not feasible.

Response: If appears that there is sufficient right-of-way to implement Mitigation 6-6 (widening of the eastbound approach to the Lakeville/E. Washington intersection). Regarding the feasibility of Mitigation 6-7 (widening of the westbound approach to the Lakeville/D Street intersection), please see response to similar comment 3.02.

Comment SP.05: Conflicts regarding visual impact mitigations relative to SMART Code need to be resolved. More site planning flexibility needed. Clarify language.

Response: Mitigations 9-1, 9-2, and 9-3 simply state that the draft "Smart Code" zoning map, building standards table, building placement provisions, frontage type provisions, civic spaces provisions, and landscape standards should be incorporated into the SPARC Design Guidelines.

Committee Member Barrett

Comment SP.06: Recommends against adoption of Statement of Overriding Consideration for historic resources. Instead, supports preparation of full EIR and public hearing for projects involving demolition of historic resources.

Response: Adoption of a Statement of Overriding Considerations does not eliminate the requirement to prepare a project-specific EIR and conduct a public hearing for projects involving demolition of historic resources. Pleas see response to similar comment SP.02 above.

Committee Member Lynch

Comment SP.07: Supports Commissioner Barrett's proposal regarding historic resources. Threat of EIR thwarted demolition of Victory Chevrolet.

Response: Please see responses to comments SP.02 and SP.06.

Committee Chair Rittenhouse

Comment SP.08: Draft EIR mitigations are generally sufficient. Supports public hearing for projects involving demolition of historic resources.

Response: Please see responses to comments SP.02 and SP.06.

Committee Chair Rittenhouse

Comment SP.09: Motion to recommend that City Council certify EIR.

Response: No Final EIR written response necessary.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse

Gray Davis
Governor

Tal Finney
Interim Director

1

ACKNOWLEDGEMENT OF RECEIPT

DATE: March 10, 2003

TO: Mike Moore
City of Petaluma
11 English Street
Petaluma, CA 94952

RECEIVED
MAR 12 2003
COMMUNITY DEVELOPMENT DEPARTMENT

RE: Central Petaluma Specific Plan
SCH#: 2002112039

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: March 4, 2003
Review End Date: April 17, 2003

We have distributed your document to the following agencies and departments:

Caltrans, District 4
Department of Boating and Waterways
Department of Fish and Game, Region 3
Department of Housing and Community Development
Department of Parks and Recreation
Department of Toxic Substances Control
Department of Water Resources
Native American Heritage Commission
Public Utilities Commission
Regional Water Quality Control Board, Region 2
Resources Agency
State Lands Commission

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.

1. Memorandum from State Clearinghouse, State of California Governor's Office of Planning and Research (OPR); March 10, 2003

Comment 1.01: Receipt of Draft EIR acknowledged. State review period start and end identified (March 4 through April 17, 2003).

Response: No further Final EIR written response is necessary.

remove exact location

2

prehistoric archaeological resources reported inside the Specific Plan area. One possible prehistoric site (C-1200) was reported by William Roop at the southern edge of the Specific Plan area, at 606 Petaluma Boulevard between H and I Streets, as a "possible shell midden with lithics". This location has not been verified, and no formal archaeological site survey form has been prepared for the site.

The October 2001 report from the NWIC states that the Specific Plan area contains no recorded Native American cultural resources. Previously, in 1988, the NWIC reported on the findings of its research related to a proposed dredging plan for the Petaluma River near the western edge of the Specific Plan area. The study focus was the immediate bank areas of the river, which led the NWIC to comment on the presence of site Son-399/H, a combined historical site with a large prehistoric component of dark midden containing shellfish fragments. However, by the time the NWIC staff visited the site in 1988, the location as described by King in 1966 had undergone massive alteration, leading to the alteration or obliteration of large portions of the prehistoric site.

Nevertheless, even though no Native American cultural resources have been verified within the Specific Plan area, the area is located near historic marsh margins, including alluvial benches associated with the Petaluma River. The River is a prime location for potential Native American archaeological sites in this portion of Sonoma County. Several native American archaeological sites have been recorded both up-river and downriver of the immediate project vicinity. Given the environmental setting and the archaeologically sensitive nature of the general area, there is a high potential for Native American sites in the Specific Plan area.[1]

7.1.2 Historic Resources

The 2001 Carey & Co. *historic resources survey* report indicates that the Specific Plan area contains numerous locally valuable historic and architectural resources, including examples of agricultural, industrial, municipal and residential building types. The Carey & Co. survey identified 66 potentially significant historic properties within the proposed Specific Plan area boundary, including three already locally designated as City Historic Landmarks. There is also one area, the "Petaluma Historic Commercial District", listed in the National Register of Historic Places. In addition, the historic resources evaluation identified 20 properties that appear to merit a local interest status, and one additional area that has the potential to be a locally designated historic district.

Historic resources identified by the Carey & Co. *historic resources survey* report within each Specific Plan subarea are outlined below.

(a) North River Subarea. The *historic resources survey* report identified 22 potentially significant historic resources in the North River subarea, including six industrial/agricultural

[1] Haydu.

2

(e) Disturb any human remains, including those interred outside of formal cemeteries?

7.3.2 Impacts and Mitigation Measures

Impact 7-1: Disturbance of Archaeological Resources. New central area development and redevelopment permitted and encouraged by the Specific Plan could disturb existing unrecorded sensitive archaeological resources in the Specific Plan area. This possibility represents a ***potentially significant impact*** (see criteria (b), (d) and (e) under subsection 7.3.1, "Significance Criteria," above).

The Specific Plan area possesses a high potential for containing buried or obscured prehistoric cultural resources, particularly in the vicinity of the river. Due to the broad nature of the proposed Specific Plan and associated future central area development activities, and the lack of archaeological field data on the area, it is difficult to forecast the specific effects of future project-facilitated development on archaeological resources. However, as noted in subsection 7.1.1 above, because of the riverfront location, there is a high probability of encountering additional archaeological sites in the Specific Plan area during project-facilitated construction activities. These construction activities (e.g., grading, excavation) could disturb or destroy such archaeological resources (e.g., subsurface lithic materials, trash scatters, historic articles, etc.).

Mitigation 7-1: During the City's normal project-specific environmental review (Initial Study) process for all future, discretionary, public improvement and private development projects in the Specific Plan area, the City shall determine the possible presence of, and the potential impacts of the action on, archaeological resources. The individual project sponsor should be required to contact the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) to determine whether the particular project is located in a sensitive area. Future development projects that the CHRIS determines may be located in a sensitive area--i.e., on or adjoining an identified archaeological site--shall proceed only after the project sponsor contracts with a qualified archaeologist to conduct a determination in regard to cultural values remaining on the site and warranted mitigation measures.

ADD: or having the potential to contain a archaeological site.

In general, to make an adequate determination, the archaeologist should conduct a preliminary field inspection to: (1) assess the amount of visible ground-surface, (2) identify locations of visible ground-surface, (3) determine the nature and extent of previous impacts, and (4) assess the nature and extent of potential impacts. Such field inspection may demonstrate the need for some form of additional subsurface testing (e.g., excavation by auger, shovel, or backhoe unit). Alternatively, onsite monitoring of subsurface activities (i.e., during grading or trenching) may be needed.

(continued)

2

Mitigation 7-1 (continued):

If a significant archaeological resource is identified through this field inspection process, the City and project proponent shall seek to void damaging effects to the resource. Preservation in place to maintain the relationship between the artifact(s) and the archaeological context is the preferred manner of mitigating impacts to an archaeological site. Preservation may be accomplished by:

- Planning construction to avoid the archaeological site;
- Incorporating the site within a park, greenspace, or other open space element;
- Covering the site with a layer of chemically stable soil; or
- Deeding the site into a permanent conservation easement.

When in-place mitigation is determined by the City to be infeasible, a *data recovery plan*, which makes provisions for adequate recovery of the scientifically consequential information about the site, shall be prepared and adopted prior to any additional excavation being undertaken. Such studies must be submitted to the California Historical Resources Regional Information Center (i.e., the NWIC at Sonoma State University). If Native American artifacts are indicated, the studies must also be submitted to the Native American Heritage Commission. Identified cultural resources should be recorded on form DPR ~~422~~ (archaeological sites). Mitigation measures recommended by these two groups and required by the City shall be undertaken, if necessary, prior to resumption of construction activities.

523 (A-L)

A *data recovery plan* and data recovery shall not be required if the City determines that testing or studies already completed have adequately recovered the necessary data, provided that the data have already been documented in another EIR and are available for review at the California Historical Resource Regional Information Center [*CEQA Guidelines* section 15126.4(b)].

In the event that subsurface cultural resources are otherwise encountered during approved ground-disturbing activities for a Specific Plan area construction activity, work in the immediate vicinity shall be stopped and a qualified archaeologist retained to evaluate the finds following the procedures described above.

If human remains are found, special rules set forth in State Health and Safety Code section 7050.5 and *CEQA Guidelines* section 15126.4(b) shall apply.

Implementation of this measure would reduce this impact to a ***less-than-significant level.***

2

Impact 7-2: Destruction/Degradation of Historic Resources. The Specific Plan (Historic Preservation chapter) contains policies for recognizing historic resources, expanding the Petaluma Historic Commercial District, creating two local historic districts, and conducting additional historical research. Nevertheless, future development projects that are otherwise consistent with the proposed Specific Plan may cause substantial adverse changes in either (a) the significance of one or more of the 66 potentially significant historic resources identified in the City-commissioned Carey & Co. *historic resources survey*, or (b) the significance of the designated Petaluma Historic Commercial District or local historic districts created under the Specific Plan. Substantial adverse changes that may occur include physical demolition, destruction, relocation, or alteration of one or more resources, such that the resource and/or the historic district in which it is located is "materially impaired." The significance of an historic resource is considered to be "materially impaired" when a project demolishes or materially alters the physical characteristics that justify the determination of its significance [*CEQA Guidelines* section 15064.5(b)]. Such an adverse change to a CEQA-defined historic resource would constitute a ***significant impact*** (see criteria (a), (b) and (d) under subsection 7.3.1, "Significance Criteria," above).

In federal parlance this term applies to both archaeological and built environment resources. To minimize confusion I suggest you use another term for buildings and structures.

(a) Specific Plan Provisions for Historic Resources. As noted in the "Setting" section above, a *historic resources survey* was conducted by Carey & Co. Architecture in 2001 to provide the necessary information for preparation of the proposed Specific Plan and this Specific Plan EIR. The Carey & Co. *historic resources survey* has applied rules set forth in the California Environmental Quality Act (CEQA) for determining potentially significant resources. The *historic resource survey* report identifies 66 potentially significant historic properties in the Specific Plan area (see subsection 7.1.2, "Historic Resources," above). Many of these potentially significant properties have not been previously designated or recognized. In addition, the *historic resources survey* report recommends extension of the existing Petaluma Historic Commercial District and designation to encompass a local historic area in the Riverfront Warehouse subarea that contains a collection of buildings that are not necessarily individually significant, but form an environment which is distinguished by its continuity, setting, urban design features, and integrity.

The proposed Specific Plan provides for this district expansion, along with creation of two local historic districts and recognition of individual historic resources (see subsection 3.6.7, "Historic Preservation," in section 3, Project Description, of this EIR). In addition, the Specific Plan proposes nominating four properties in the Riverfront Warehouse subarea, as well as the Sewer Plant and Jerico Dredging properties in the Lower Reach subarea, for local historic landmark designation. Nevertheless, it is possible that a future development project that is otherwise consistent with the Specific Plan would involve building demolition or other substantial changes that would "materially impair" the historic resource or an historic district within the Specific Plan area.

2. Suggested Edits from Northwest Information Center (NWIC), California Historic Resources Information System (CHRIS); March 13, 2003

Comment 2.01: Suggested edits to pages 7-2, 7-5, 7-6, and 7-7 of Draft EIR Cultural and Historic Resources chapter.

> Response: All suggested edits have been incorporated. See revisions to Draft EIR pages 7-2, 7-5, 7-6, and 7-7 in section 3 herein (Revisions to the Draft EIR).

3

Moore, Mike

From: Vin Smith [vin@basin-street.com]
Sent: Friday, March 28, 2003 2:13 PM
To: Moore, Mike
Subject: CPSP EIR Comments

Final trip generation--3-25-03..

Mike,

Per our conversation this morning, below are the topics we discussed:

* The programmed traffic generation for the individual TAZ's in the CPSP doesn't seem to match the minimum/maximum development requirements in the "Smart Code". 3.01

As I understand it, the FAR's and min/max densities suggested in the pre-Smart Code CPSP document were too high and were reduced to 25% of the total capacity (an across the board reduction). This was done so that all intersections were not at LOS F and worse (and I'm sure for other reasons as well).

Based on our current Petaluma Town Center proposal, following the development standards of the Smart Code results in traffic that is at, or slightly above the programmed traffic for the TAZ's in the CPSP. It should be noted that both of the TAZ' still have development potential but that future development, if it happens, would exceed the programmed traffic for these TAZ's following the numbers used for the CPSP EIR analysis. The question we did not discuss this morning but is worth asking is, has a calculation of the minimum development requirements of the Smart Code been compared to the 25% of FAR/Density number used in the traffic modeling? Depending on how you were going to proceed on the EIR, this may not be necessary and the EIR may simply allow for the development of the Smart Code through careful findings within the Statements of Overriding Considerations?

I've attached the spreadsheet analysis John Dowden prepared that addresses this issue. I also forwarded his email to you for your use.

* The mitigation measure suggested for the intersection of Lakeville and "D" Street doesn't appear to work given the restricted right-of-way. 3.02

Under the current CPSP EIR, the Lakeville/"D" Street intersection is at the absolute low end of LOS E when a westbound "D" Street right turn lane is added. It does not appear as if there is enough room for this improvement. In addition, with our development and this additional lane in place, the intersection may drop below LOS E. Is it anticipated that the Statement of Overriding Considerations (SOC) will allow for development in the area above and beyond that anticipated by the CPSP EIR (i.e. development that is consistent with the Smart Code)? Would using a range for these specific intersections be a way of getting to the SOC and allowing for other development (i.e. 25% on the low end of range and Smart Code Buildout on the high end)? 3.03

* The intersection of Caulfield and Lakeville has traffic volumes that appear very low for the anticipated development on the Pomeroy sites and the city Corp. Yard site (see Figures 9 & 10 in Appendix 21.5, intersection No. 7). 3.04
* There is no discussion of a relocated (or new) RR Crossing at Caulfield Lane. Should there be some discussion and projected traffic volumes crossing the RR that relate to the possible future development of this area? 3.05

Mike, I hope this helps. Let me know if you need me to formalize this or if this is enough for you to address these issues.

Thanks for your time and attention to these issues.

Vin Smith
Vice President
Basin Street Properties

3

<<Final trip generation--3-25-03.xls>>

operties - Petaluma Town Center Project
ia Specific Plan Assumptions)

5/2003

	Trip Generation Rates								Traffic Data for Traffic Zone 313								Traffic Data for Traffic Zone 231							
	Daily Rate	AM In	AM Out	AM Total	PM In	Pm Out	PM Total	Units	Quantities	Daily Trips	AM In	AM Out	AM Total	PM In	Pm Out	PM Total	Quantities	Daily Trips	AM In	AM Out	AM Total	PM In	Pm Out	PM Total
odel																	*Amounts = 1/2 from model (1)*							
y	10	0.1875	0.5625	0.75	0.6565	0.3535	1.01	dwellings	51	510	10	29	39	33	18	51	13	130	2	7	9	9	5	14
ily	6.5	0.0816	0.4284	0.51	0.4154	0.2048	0.62	dwellings	76	494	6	33	39	32	16	48	7.5	49	1	3	4	3	2	5
	17	2.1208	0.2892	2.41	0.391	1.909	2.3	1,000 sq. ft.	24.792	421	53	7	60	10	47	57	4.9915	85	11	1	12	2	10	12
	40	1.1137	1.4763	2.59	3.0768	3.3332	6.41	1,000 sq. ft.	61.647	2468	69	91	160	190	205	395	12.4115	496	14	18	32	38	41	79
nter	40	1.1137	1.4763	2.59	3.0768	3.3332	6.41	1,000 sq. ft.	26.632	1065	30	39	69	82	89	171	5.362	214	6	8	14	16	18	34
al	7	0.8098	0.1104	0.92	0.1176	0.8824	0.98	1,000 sq. ft.		0	0	0	0	0	0	0	44.0845	309	36	5	41	5	38	43
trial	7	0.8098	0.1104	0.92	0.1176	0.8824	0.98	1,000 sq. ft.	10.289	72	8	1	9	1	9	10	2.0715	15	2	0	2	0	2	2
	4.9	0.369	0.081	0.45	0.1224	0.3876	0.51	1,000 sq. ft.		0	0	0	0	0	0	0	22.2825	109	8	2	10	3	9	12
	1.4	0.252	0.168	0.42	0.0504	0.0756	0.126	Students	420	588	106	71	177	21	32	53	0	0	0	0	0	0	0	0
	6.5	0.26	0.065	0.325	0.065	0.26	0.325	1,000 sq. ft.	12.275	80	3	1	4	1	3	4	0	0	0	0	0	0	0	0
										5698	285	272	557	370	419	789		1407	80	44	124	76	125	201
isin Street																								
y	10	0.1875	0.5625	0.75	0.6565	0.3535	1.01	dwellings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ily	6.5	0.0816	0.4284	0.51	0.4154	0.2048	0.62	dwellings	76	494	6	33	39	32	16	48	98	637	8	42	50	41	20	61
	17	2.1208	0.2892	2.41	0.391	1.909	2.3	1,000 sq. ft.	10	170	21	3	24	4	19	23	52.5	893	111	15	126	21	100	121
	40	1.1137	1.4763	2.59	3.0768	3.3332	6.41	1,000 sq. ft.	66	2640	74	97	171	203	220	423	7.5	300	8	11	19	23	25	48
nter	40	1.1137	1.4763	2.59	3.0768	3.3332	6.41	1,000 sq. ft.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
al	7	0.8098	0.1104	0.92	0.1176	0.8824	0.98	1,000 sq. ft.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
trial	7	0.8098	0.1104	0.92	0.1176	0.8824	0.98	1,000 sq. ft.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	4.9	0.369	0.081	0.45	0.1224	0.3876	0.51	1,000 sq. ft.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	1.76	0.009	0.001	0.01	0.083	0.007	0.07	seat	1400	2464	13	1	14	88	10	98	0	0	0	0	0	0	0	0
										5768	114	134	248	327	265	592		1830	127	68	195	85	145	230
pment Remainint Within Traffic Zone																								
y	10	0.1875	0.5625	0.75	0.6565	0.3535	1.01	dwellings		0	0	0	0	0	0	0		0			0			0
ily (2)	6.5	0.0816	0.4284	0.51	0.4154	0.2048	0.62	dwellings	43	280	4	18	22	18	9	27		0			0			0
	17	2.1208	0.2892	2.41	0.391	1.909	2.3	1,000 sq. ft.	1.5	26	3	0	3	1	3	4		0			0			0
(4)	40	1.1137	1.4763	2.59	3.0768	3.3332	6.41	1,000 sq. ft.	39.5	1580	44	58	102	122	132	254		0			0			0
nter	40	1.1137	1.4763	2.59	3.0768	3.3332	6.41	1,000 sq. ft.		0	0	0	0	0	0	0		0			0			0
al	7	0.8098	0.1104	0.92	0.1176	0.8824	0.98	1,000 sq. ft.	9.8	69	8	1	9	1	8	9		0			0			0
trial	7	0.8098	0.1104	0.92	0.1176	0.8824	0.98	1,000 sq. ft.		0	0	0	0	0	0	0		0			0			0
	4.9	0.369	0.081	0.45	0.1224	0.3876	0.51	1,000 sq. ft.		0	0	0	0	0	0	0		0			0			0
	6.5	0.26	0.065	0.325	0.065	0.26	0.325	1,000 sq. ft.	12.275	80	3	1	4	1	3	4		0			0			0
										2035	62	78	140	143	155	298		0			0			0
s (all development)										7803	176	212	388	470	420	890		1830	127	68	195	85	145	230
rips Being Added by Project										*2107*	*-109*	*-60*	*-169*	*100*	*1*	*101*		*423*	*47*	*24*	*71*	*9*	*20*	*29*
be added to Fehr and Peers Projections										2530	62	36	98	109	21	130								

231 surrounds the area between First Street and the River and from D Street to H Street. Therefore, assuming a uniform development pattern, ie development from the model was assumed for the area between D Street and F Street (the northern portion of zone 231).

esidential units within the Basin Street Lofts.

)0 square feet between First Street and the River north of C Street.

buildings: A = 21,500 square feet within the Basin Street Town Center south of B Street. and B = 18,000 commercial as part of Basin Street Lofts

3. Memorandum from Vin Smith, Vice President, Basin Street Properties; March 28, 2003

Comment 3.01: Re: Discrepancy between SMART Code and Specific Plan development allowances in traffic impact modeling. Smart Code development allowances would result in TAZ traffic generation rates slightly above traffic model rates reflected in Specific Plan and Draft EIR. Has City compared (calculated) development limitations of Smart Code versus proposed 25 percent cap FAR/density allowances assumed for traffic modeling. Should EIR be clarified/refined to provide CEQA compliance for Smart Code buildout?

> Response: The broad level of analysis for a plan-level EIR is intended to provide a realistic estimate of the expected level of traffic generation within the Plan area under cumulative (year 2020) conditions and the impacts, if any, of that traffic on the City's traffic network. For the purposes of this analysis, a realistic estimate of the amount of new development to occur within the CPSP area under year 2020 conditions was derived. It would be unrealistic to assume that 100% of allowable development would occur by 2020, since economic conditions, site-specific issues (including access) and other factors generally limit full development potential. Also, it would be unrealistic to assume that full buildout would occur within 17 years. For the purpose of this DEIR, it is assumed that 25% of full development within the CPSP area would occur by 2020.
>
> Development at specific sites, or within specific traffic analysis zones (TAZ), may exceed the level of traffic anticipated by the DEIR. However, the overall level of traffic generated by the amount of development reasonably anticipated to occur within the CPSP area under cumulative conditions would not be exceeded by these individual developments. Rather, the precise location of the new trips within the CPSP area may be slightly different than was anticipated. The analysis of impacts of specific developments (such as the proposed Petaluma Town Center described in the comment) generated at adjacent intersections that exceed that of the CPSP would be conducted as part of each new development's own traffic study.

Comment 3.02: Mitigation for Lakeville/D Street intersection doesn't appear to work given restricted right-of-way.

> Response: A site visit indicated that provision of the additional right turn-lane could require intrusion into existing landscaping and parking for the liquor store adjacent to the intersection. Additional design analysis would be needed for this mitigation. If adequate right-of-way is not available to add a right turn-lane from D Street to Lakeville Street, then the impact would be significant and unmitigable.

Comment 3.03: Even with Draft EIR recommended mitigation (additional lane), Lakeville/D Street intersection may drop to LOS E with Basin Street project. Will Statement of Overriding Considerations indicated by Draft EIR as necessary (significant unavoidable impact) allow for development in area beyond what is anticipated in Draft EIR, i.e., up to Smart Code permitted maximum? Or should range of possible development between 25 percent cap and Smart

Code allowances be reflected in Draft EIR to permit Statement of Overriding Considerations to apply to full Smart Code buildout?

Response: The comment poses a policy question outside the scope of this EIR.

Regarding the question about the need for a Statement of Overriding Considerations for Mitigation 6-7 (significant unavoidable impact), the Statement of Overriding Considerations would apply only to the cumulative buildout scenario assumed in this EIR--the 25 percent Specific Plan area cap plus assumed cumulative development. If a proposed project results in a traffic analysis zone development total that exceeds what is assumed in this EIR (to be determined at the project-specific Initial Study phase), the Statement of Overriding Considerations would not apply; rather, additional CEQA documentation would be necessary. A change now in the Draft EIR development assumptions could result in the need to recirculate the Draft EIR under CEQA Guidelines section 15088.5. Also, see response to similar comment 4.01.

Comment 3.04: Traffic volumes shown for Caulfield/Lakeville intersection seem very low for anticipated development on Pomeroy site and City corporation yard.

Response: The initial furness process to validate the forecasted traffic model volumes misreported the traffic volumes on this roadway and at the intersection of Mountain View/Petaluma Blvd. (at each end of the proposed Southern Crossing). This issue has been addressed and traffic operations at both intersections have been updated.

Comment 3.05: No discussion of relocated or new railroad crossing at Caulfield Lane; should there be, including some discussion of projected future traffic volumes at the crossing assuming possible future development of this area?

Response: The design and operation of the proposed RR Crossing has not yet been determined. It is likely that commuter rail traffic, if implemented, would occur at frequencies of 30 minutes or more, which would not be expected to significantly impact traffic operations. More detailed analysis would be conducted during design of the roadway and implementation of rail service.

4

March 31, 2003

615 Prospect Street
Petaluma, CA 94952
(707) 762-6294

Mike Moore
City Of Petaluma
P.O. Box 61
Petaluma, CA 94953

RECEIVED
APR 01 2003
COMMUNITY DEVELOPMENT DEPARTMENT

Cc: Petaluma City Council

Dear Mr. Moore,

I am writing to ask that the following 2 questions be considered in the Environmental Impact Report for the Central Petaluma Specific Plan (I have followed each question with my reasons for asking same).

1. Why does the Draft Environmental Impact Report for the Central Petaluma Specific Plan talk about a proposed cap equal to 25% of overall maximum build out? 4.01

The Draft Central Petaluma Specific Plan does not have a proposed cap. You advised the City of Petaluma SPARC that there would be no cap in the final Central Petaluma Specific Plan. (For the record, I think a cap would be a mistake.) The fact that the Draft Environmental Impact Report for the Central Petaluma Specific Plan talks about a proposed cap creates an element of confusion.

2. Why does the Draft Environmental Impact Report for the Central Petaluma Specific Plan study a 25% build out for each of the 4 districts?' 4.02

I can find no analysis of the probable 20 year build out for the Central Petaluma Specific Plan but I am quite certain it will be beyond 25% in certain districts. I speculate that 20 year build out in the North River and Riverfront Warehouse districts could be as low as 25% but I also speculate that 20 year build out in the Turning Basin and Lower Reach districts will be in the 50% to 70% range. I believe it is unfair to the community to study less than a 50% build out in the Turning Basin and Lower Reach districts. While it is plausible that a new Environmental Impact Report could be generated once a 25% percent build out has been reached in any of the districts it seems to me that such an approach would be disingenuous. If the probable long-term impacts of the Central Petaluma Specific Plan are not studied from the outset the community cannot properly evaluate the merits of the Draft Central Petaluma Specific Plan.

Sincerely,

Todd Gracyk

4. Letter from Todd Gracyk, 615 Prospect Street, Petaluma; March 31, 2003

Comment 4.01: Why does Draft EIR study/assume proposed 25 percent total buildout cap when Specific Plan does not have a proposed cap? Confusing.

> Response: The draft Specific Plan proposes maximum building height, floor area ratio, and residential density allowances for site-specific application throughout the Specific Plan area (Mixed Use designation). The allowances are relatively generous in order to encourage private sector interest in mixed use development. It is not anticipated or intended that the entire Specific Plan mixed use designated area, perhaps exceeding 200 acres, would ultimately reach full buildout to these proposed building height, floor area ratio, and residential density maximums; rather, as explained in Draft EIR section 3.5, a more reasonable assumption has been made for CEQA purposes that a more reasonably foreseeable growth assumption for each of the three planning subareas is that each would reach 25 percent of its ultimate buildout capacity under these generous Specific Plan allowances. The 25 percent "cap" assumption is considered to be reasonable for CEQA purposes. The overall (aggregate) rate and intensity of the development/redevelopment in the four Specific Plan subareas is not expected to exceed this projection. In the event that the intensity of growth does ultimately begin to exceed the amount assumed in this EIR (the 25 percent cap indicated in Table 3.1) in one of more of the four planning subareas, additional CEQA documentation would be necessary.

Comment 4.02: Why does Draft EIR study/assume 25 percent cap for each of the four districts? No analysis of probable 20-year buildout scenario beyond 25 percent in certain districts; commenter speculates actual buildout at 50 to 70 percent range in Turning Basin and Lower Reach districts.

> Response: Please see response to comment 4.01.

Comment from Petaluma Transit

Moore, Mike

5

From: Hromek, Sharon
Sent: Tuesday, April 08, 2003 9:16 AM
To: Moore, Mike
Cc: Ryan, Jim
Subject: Draft EIR for Central Petaluma Specific Plan

Michael,

Jim Ryan would like the following changes and deletions made to the subject document.

Under 6.1.8 Public Transit

a. Petaluma Transit should read: "Petaluma Transit provides service within the City limits. Buses operate on 60-minute intervals during weekdays. Petaluma Tansit provides five buses on three fixed-routes that connect Lakeville Business Park N. McDowell Extension business and the west side of town to Washington Square, Petaluma Plaza, the Library and the downtown."

c. Golden Gate Transit

Include Route 80

Michael, If you have any questions, please call Jim.

Thanks

Sharon L. Hromek
PF&S

5. Memorandum from Sharon K. Hromek for Vin Ryan, Petaluma Transit; April 5, 2003

Comment 5.01: Revisions recommended to Draft EIR subsection 6.1.8 regarding Petaluma Transit and Golden Gate Transit service characteristics.

> Response: Comments acknowledged. The proposed revisions have been incorporated. See revisions to pages 6-13 and 6-14.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION
P. O. BOX 23660
OAKLAND, CA 94623-0660
(510) 286-4444
(510) 286-4454 TDD

Flex your power!
Be energy efficient!

6

April 16, 2003

SON-101-General
SON101840
SCH 2002112039

Mr. Mike Moore
City of Petaluma
Community Development Department
11 English Street
Petaluma, CA 94952

Dear Mr. Moore:

Central Petaluma Specific Plan – Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the proposed specific plan. We have reviewed the DEIR and have the following comments to offer:

Trip Distribution and Assignment
Please provide in illustrative format the project generated trip distribution and assignment information discussed on Page 6-26 of the DEIR. 6.01

U.S. 101 Ramps/ Old Redwood Highway Intersection
Vehicle queuing at the adjacent intersections should be analyzed to determine if the recommended mitigation is appropriate. Unfortunately, analyses of these intersections are not included in the DEIR, but queues from these intersections could potentially extend through the ramp intersections and negate some of the benefits these improvements would appear to have. 6.02

U.S. 101 Southbound Ramps/ E. Washington Street Intersection
As part of the Department's Marin-Sonoma Narrows project on U.S. 101, a new southbound loop on-ramp is planned at this interchange. What impacts will this have on operations at the intersection for the cumulative scenarios? 6.03

6

With the implementation of mitigation measure 6-8 the expected level-of-service (LOS) will be D during the PM peak hour under project Scenario 1. What is the condition of traffic on the off-ramp at this location? Do you anticipate that traffic may back up on the off-ramp and onto the freeway mainline?

Lakeville Street/ D Street Intersection

6.04

Table 6.7 shows the existing AM LOS at the Lakeville Street/ D Street intersection to be F. However, the proposed mitigation addresses PM peak hour operations. Has a study been completed to determine if any mitigation measures can be implemented to offset AM impacts? What impacts will the recommended mitigation have on AM peak hour operations?

U.S. 101 Operations

6.05

1. The DEIR indicates that even after the Marin-Sonoma Narrows project is constructed, traffic congestion on U.S. 101 will still occur. Freeway congestion may also have an impact on the operation of ramp intersections. For example, on-ramp traffic that is constrained by congestion on the freeway could result in vehicle queuing on some on-ramps and local streets. The DEIR should include an assessment of on-ramp queuing to determine if on-ramp queues will extend through the ramp intersections and impact on-ramp operations.

6.06

2. Vehicle queuing from off-ramp intersections should also be addressed. Queues that extend onto the freeway from an off-ramp intersection would result in even poorer freeway operations.

6.07

3. Mitigation measures for mainline U.S. 101 and U.S. 101 ramp intersections only address PM peak hour operations. These measures may or may not be appropriate to offset AM peak hour impacts. The DEIR should include mitigation to offset AM peak hour impacts, in addition to the mitigation provided for PM peak hour impacts.

6.08

4. Intersection analyses should include assessments of queuing and available/ needed storage at the intersection approaches. Inadequate storage at an intersection could result in vehicle queues extending through adjacent intersections. If this occurs, the LOS and intersection delays at the adjacent intersections may be worse than reported.

Appendix 21.5- Supplementary Traffic Figures 8, 9 and 10

6.09

Intersection 7: Please explain why the amount of traffic traveling eastbound on Lakeville Street for "Cumulative No Project Conditions" (Figure 8) is substantially higher than the eastbound volumes for "Cumulative Plus Project Conditions- Scenario 1" (Figure 9) and "Cumulative Plus Project Conditions- Scenario 2" (Figure 10).

6

Intersection 7: The new leg of the intersection (Caulfield Lane extension) is shown as a driveway in Figures 9 and 10. However, according to the DEIR the new extension will be built as a road. The Department also recently reviewed a preliminary planning application from the City's Planning Department for a gas station and car wash facility, which indicates the Caulfield Lane extension as a road rather than a driveway. Please clarify this discrepancy. Under the three project conditions the forecasted traffic volumes at the Caulfield Lane extension approach are identical. Since the new road extension will be connecting to areas south of the railroad under Scenario 1, and to the Southern Crossing under Scenario 2, it is unlikely that the new road extension will carry the same amount of traffic.

Intersection 8: Under the three project conditions the forecasted traffic volumes at this intersection are identical. The current driveway, which will be converted to a road under both Scenarios 1 and 2, is expected to carry more traffic in the future. The Department also recently reviewed a preliminary planning application from the City's Planning Department for an In-N-Out Burger restaurant in this area. The restaurant, which proposes to share a driveway with the adjacent lot to the west, will most likely bring additional traffic to the intersection. 6.10

Intersection 24: The Petaluma Blvd./ Mountain View Ave. intersection, which is the southern end of the Southern Crossing corridor, is shown as having near identical traffic volumes under "Cumulative No Project Conditions" and Scenarios 1 and 2. It is unlikely that the Southern Crossing would not create a redistribution of traffic in the vicinity. If there will not be a redistribution of traffic, as indicated in Appendix 21.5, then one may question why the Southern Crossing should be built. 6.11

We recommend the City of Petaluma create a mechanism to collect fair-share fees from project developers within the Specific Plan area to contribute towards the mitigation measures for impacts to U.S. 101. 6.12

The California Environmental Quality Act (CEQA) Guidelines Section 15182(a) provides that once an environmental document for a specific plan has been certified and the specific plan adopted, any residential development project, including any subdivision or zone change that is consistent with the specific plan is exempt from additional environmental review. Therefore, we request that if the City plans to exempt residential development projects from further CEQA review, then a comprehensive list of these projects and a detailed discussion of their cumulative traffic capacity impacts on U.S. 101 be provided for our review. 6.13

The CEQA as amended on January 1, 2001 by Assembly Bill 1807, amended Public Resources Code Section 21081.7 to now require that "transportation information 6.14

6

resulting from the reporting or monitoring program adopted by a public agency" be submitted to the Department for a project of statewide, regional, or area-wide significance. To aid your agency in fulfilling this CEQA reporting requirement, the enclosed *Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to the Department of Transportation* and Mitigation Monitoring Certification Checklist are provided. The DEIR lists 14 mitigation measures for transportation-related impacts (mitigation measures 6-1 through 6-14). Please complete and sign the Certification Checklist form for the proposed specific plan that includes the above-mentioned transportation-related mitigation measures and return it to this office once the mitigation measures are approved, and again when they are completed.

We look forward to receiving a response to our comments at least ten days prior to certification of the EIR pursuant to Section 21092.5(a) of the CEQA.

Should you require further information or have any questions regarding this letter, please call Maija Cottle of my staff at (510) 286-5737.

Sincerely,

Timothy C. Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

Attachments

c: Philip Crimmins (State Clearinghouse)

6

California Department of Transportation (Department)

GUIDELINES FOR SUBMITTING TRANSPORTATION INFORMATION FROM A REPORTING OR MONITORING PROGRAM TO THE CALIFORNIA DEPARTMENT OF TRANSPORTATION (DEPARTMENT)

INTRODUCTION

The California Environmental Quality Act (CEQA) as amended on January 1, 2001, by Assembly Bill (AB) 1807, added a new provision to Section 21080.4 of the Public Resources Code (PRC).

The provision requires lead agencies to submit Notices of Preparation (NOPs) to the Governor's Office of Planning and Research when they determine that an environmental impact report will be required to approve a project.

The new law also amended PRC Section 21081.7, which now requires that "transportation information resulting from a reporting or monitoring program adopted by a public agency" be submitted to the Department when a project has impacts that are of statewide, regional, or area-wide significance.

Mitigation reporting or monitoring programs are required under PRC Section 21081.6 when public agencies include environmental impact mitigation as a condition of project approval. Reporting or monitoring takes place after approval to ensure implementation of the project in accordance with mitigation imposed during the CEQA review process.

In addition to the requirements listed above, AB 1807 obligates the Department to provide guidance for public agencies to submit their reporting or monitoring programs. Subject to these requirements, the following guidelines have been adopted by the Department.

PURPOSE OF THE GUIDELINES

The purpose of these guidelines is to establish clear and consistent statewide procedures for public agencies to submit transportation mitigation reporting or monitoring information to the Department. They are to be used by District Intergovernmental Review (IGR) Program Coordinators for identifying the scope and timing of transportation information needed, and to identify the "single point of contact" for transmittal of reporting or monitoring information from the lead agency to the Department.

6

PROCEDURES The following procedures are intended for use by District IGR Program Managers and Coordinators in directing local lead agencies to comply with PRC Section 21081.7.

A. The District IGR Coordinator will notify the CEQA lead agency in writing about transportation reporting or monitoring submittal requirements in PRC Section 21081.7 during either "early consultation", the Notice of Preparation (NOP) stage, or the Initial Study (IS) phase of the CEQA review process.

B. Detailed procedures for the CEQA lead agency to submit transportation reporting or monitoring information to the district should be attached to the district's notification letter. The submittal shall contain the following information:

1. The name, address, and telephone number of the CEQA lead agency contact who is responsible for the mitigation reporting or monitoring program (see PRC Section 21081.6[a][1]).

2. The location and custodian of the documents or other material, which constitute the record of proceedings upon which the lead agency's decision is based (see PRC Section 21081.6[a][2]).

3. Assurances from the CEQA lead agency that the Department can obtain copies of the aforementioned documents and materials, if needed, to clarify details or resolve issues related to the mitigation adopted (see PRC Section 21081.7).

4. Detailed information on impact assessment methodologies, the type of mitigation, specific location, and implementation schedule for each transportation impact mitigation measure included in the reporting or monitoring program (see PRC Section 21081.6[b]). The CEQA lead agency, at its discretion, may submit the complete reporting or monitoring program with the required transportation information highlighted.

5. A certification section which will be signed and dated by the CEQA lead agency and the Department certifying that the mitigation measures agreed upon and identified in the above checklist have been implemented, and all other reporting requirements have been adhered to, in accordance with PRC Sections 21081.6 and 21081.7.

6

C. When the project involves encroachment onto a state highway, the certification section will be signed by the District Permit Engineer. The District Permit Engineer will retain one copy of the mitigation reporting or monitoring information for the district permit files, and forward the original document to the District IGR Coordinator. The District IGR Coordinator will forward a copy to the Department's IGR Program Manager.

D. When the project does not involve encroachment onto a state highway, the certification section will be signed by the District IGR Coordinator. The District IGR Coordinator will retain the original document and forward a copy to the Department's IGR Program Manager.

APPROVED:

BRIAN J. SMITH Date
Deputy Director
Planning and Modal Programs

RANDELL H. IWASAKI Date
Deputy Director
Maintenance and Operations

6. Letter from Timothy C. Sable, District Branch Chief, Caltrans District 4, State of California, Department of Transportation; April 16, 2003

Comment 6.01: Traffic analysis trip distribution and trip assignment information requested.

Response: An illustration of the project trip distribution has been developed and enclosed at the end of these responses ("Figure 15").

Comment 6.02: For U.S. 101 ramps/Old Redwood Highway intersection mitigation, vehicle queuing at adjacent intersections should be analyzed to determine if recommended mitigation is appropriate.

Response: The concern raised by the comment is that the mitigation identified for the subject intersection, the conversion of the northbound off-ramp right-turn movement to a free right turn, may not effectively mitigate the expected queuing condition because queues from the downstream intersection may queue back to the U.S. 101 ramps intersection. As noted, the next intersection, which is the intersection of N. McDowell Boulevard and Redwood Highway, was not analyzed in the EIR. The intersection was not determined to be a significant constraint to traffic circulation relative to other intersections in the area. In addition, the General Plan Existing Conditions Report shows that this intersection currently operates at LOS C during both the AM and PM peak hours and does not experience queues that spill back to the U.S. 101 Northbound Ramps/Old Redwood Highway intersection.

Comment 6.03: For U.S. 101 southbound ramps/E. Washington intersection, what are the impacts of the Caltrans-planned new southbound loop on-ramp at the interchange on operations at this intersection under the cumulative scenario, including under implementation of Mitigation 6-3 (for Scenario 1)--will traffic back up on the off-ramp and onto the freeway mainline?

Response: The comment notes that the Sonoma-Marin Narrows project would add a new southbound loop on-ramp at this location. This would likely have a positive impact on the intersection's operation by removing a left-turn movement and allowing the elimination of one signal phase. As such, the suggested mitigation may not be required, but to be conservative, the loop on-ramp was not assumed to occur. The mitigation described in the EIR, the Narrows loop on-ramp, and other improvement options, will be subjects of discussion in the City's General Plan update. It is very likely that the City will need to update its traffic impact fee at the completion of the General Plan to reflect a new land use plan and a revised or refined traffic capital improvement program. Projects throughout the City, including those within the Central Petaluma Specific Plan area, will contribute to the traffic impact fee in proportion to their impacts to citywide transportation facilities.

Comment 6.04: The Draft EIR proposed mitigation for the Lakeville Street/D Street intersection addresses PM peak hour operations; Table 6.7 shows AM peak hour operations at F. Has mitigation of this AM condition been studied; how will the proposed PM peak hour mitigation affect AM peak hour operation?

Response: Error in the draft report. The AM peak hour LOS at this intersection under existing conditions is LOS D and is not expected to deteriorate under cumulative conditions.

Comment 6.05: Re: U.S. 101 operations, Draft EIR should include assessment of on-ramp queuing at freeway ramp intersections (to determine if on-ramp queues will extend through the ramp intersections, impacting on-ramp operations).

Response: Several comments request additional analysis at specific locations that were not included in the transportation analysis, or request more detailed operations (and queuing) analysis rather than isolated intersection analysis. The scope of work for this project was developed in coordination with various City departments. In addition, a Notice of Preparation (NOP) was issued providing outside agencies and parties opportunities to comment on the scope of the transportation analysis. The scope executed and reported in the DEIR is responsive to comments made during the NOP process. Also, the types of analysis requested are not normally prepared for such environmental documents, but rather as part of project design (project study reports and project reports). In response to this comment, we have incorporated language into Mitigations 6-1, 6-2, and 6-3, which are affected by these comments, acknowledging that additional design work would be required to address the subject concerns and that improvement options should be refined based on the results of this analysis.

Comment 6.06: Vehicle queuing from off-ramp intersections should also be addressed (to determine if queues would extend from off-ramp intersection onto freeway, resulting in even poorer freeway operations).

Response: See response 6.05

Comment 6.07: Mitigations for mainline U.S. 101 and U.S. 101 ramp intersections only address PM peak hour operation; may or may not be appropriate to offset AM peak hour impacts.

Response: See response 6.05

Comment 6.08: Ramps-intersection analysis should include assessment of queuing and available storage at intersection approaches; inadequate storage may affect adjacent intersections (may be worse than reported).

Response: See response 6.05

Comment 6.09: Appendix 21.5 questions re: (a) intersection 7 volumes; (b) configuration of new leg of intersection (Caulfield Lane extension)--driveway or road; and (c) Scenario 1 vs. Scenario 2 traffic volume comparison.

Response: The question raised by the comment is why the amount of traffic traveling eastbound on Lakeville Street for "Cumulative No Project Conditions" is substantially higher that the eastbound volume for "Cumulative Plus Project Conditions Scenario 1." The decrease of traffic on eastbound Lakeville Street under Cumulative Plus Project Scenario 1 is largely due to the "Road Diets" (lane reduction from four to two lane with the addition of bike lanes) that would be carried out on Lakeville Street and Petaluma Boulevard under this scenario (reference pages 6-18 and 6-19 in the DEIR). Under the Cumulative Plus Project Scenario 1, traffic is expected to divert to parallel side streets as alternate routes.

Another comment raised regarding this intersection was that the forecasted traffic volumes at the Caulfield Lane extension approach which connects to areas south of Lakeville Street under Scenario 1 and to the Southern Crossing under Scenario 2 were identical. The initial DEIR analysis misreported the traffic volumes on this roadway under the cumulative scenarios. This issue has been addressed and traffic operations at this intersection have been updated in this Final EIR. See new figures (exhibits) which follow these letter 6 responses.

Comment 6.10: Appendix 21.5 questions re: intersection 8 assumptions.

Response: The main concern of the comment is that the proposed In-n-Out Burger restaurant to be located just south of the Lakeville Street would potentially impact traffic operations at this intersection. Although it is likely that the restaurant would bring additional traffic to the intersection, this would be further addressed in the CEQA document to be prepared for the proposed In-n-Out restaurant.

Comment 6.11: Appendix 21.5 questions re: intersection 24 traffic volume assumptions for Scenarios 1 and 2.

Response: The initial analysis to validate the forecasted traffic model volumes misreported the traffic volumes on the westbound approach (Southern Crossing) of the Petaluma Blvd./Mountain Avenue intersection. This issue has been addressed and traffic operations at this intersection has been updated. See new figures (exhibits) which follow these letter 6 responses.

Comment 6.12: Mechanism to collect fair-share fees from project developers within Specific Plan area towards U.S. 101 mitigations recommended.

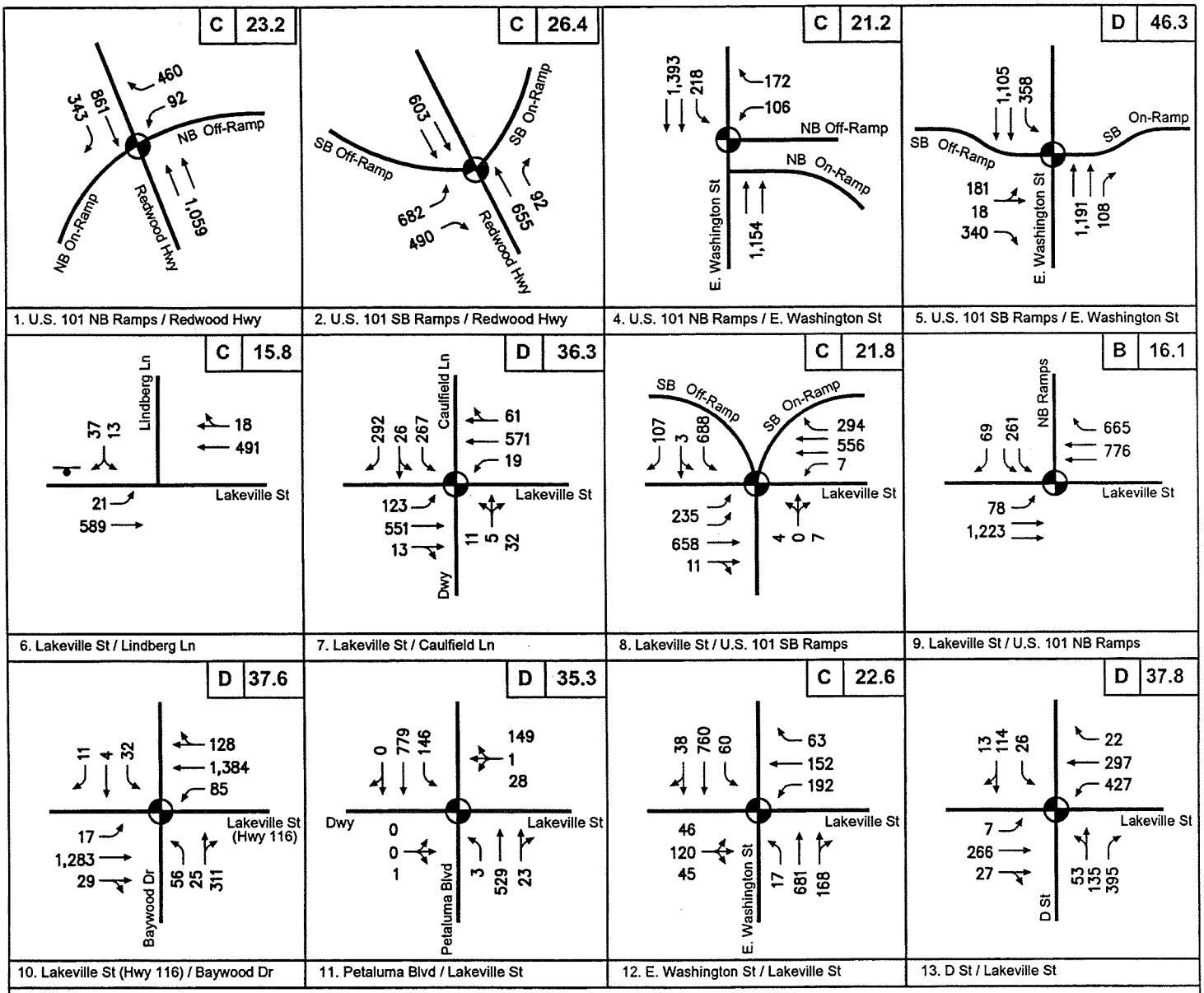
Response: Comment 6.12 includes a recommendation pertaining to interregional traffic impact fees, a concept which is out of the scope of this EIR.

Comment 6.13: Comprehensive list of any future Specific Plan area residential projects expected to be exempt from CEQA review, and detailed discussion of their cumulative traffic capacity impacts on U.S. 101, requested now for Caltrans review.

> Response: At this point, no such specific projects have been identified or can be reasonably foreseen by the City.

Comment 6.14: Completion of signed Mitigation Monitoring Certifications checklist requested by Caltrans for Mitigations 6-1 through 6-14.

> Response: Such a completed checklist will be provided to Caltrans at the appropriate future time.



Central Petaluma SP EIR

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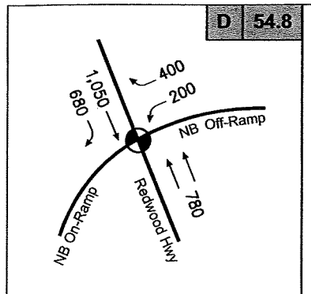
AM PEAK HOUR TRAFFIC VOLUMES AND LANE CONFIGURATIONS EXISTING CONDITIONS

February 2003

1027-0081/acadgraphics/0081-01 fig 3

FIGURE 3



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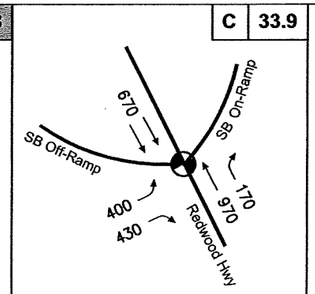

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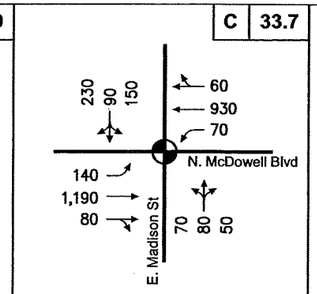
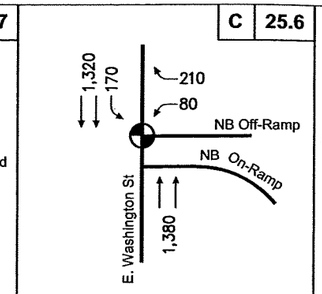


3. N. McDowell Blvd / E. Madison St



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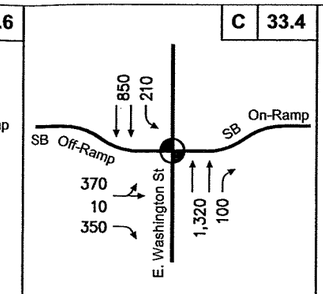

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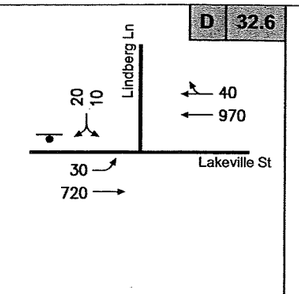
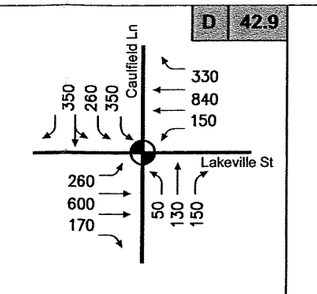


6. Lakeville St / Lindberg Ln



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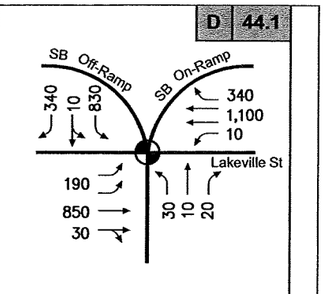

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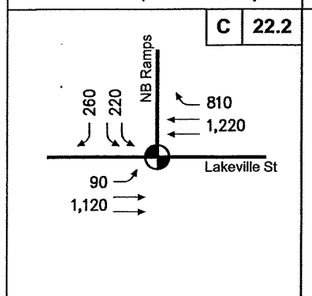

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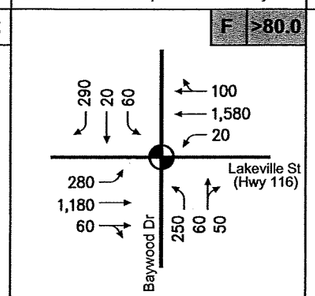

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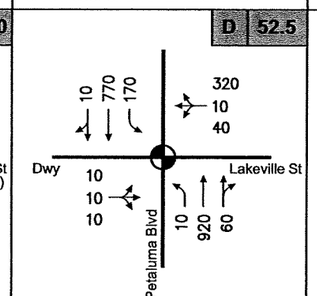

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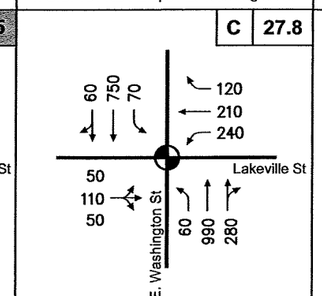

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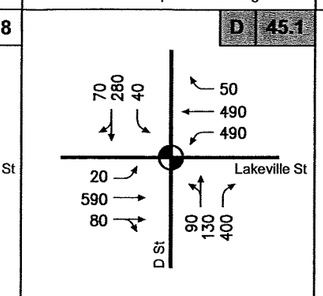

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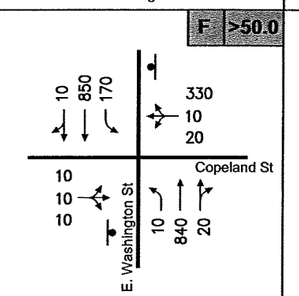

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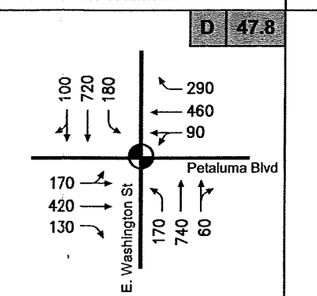

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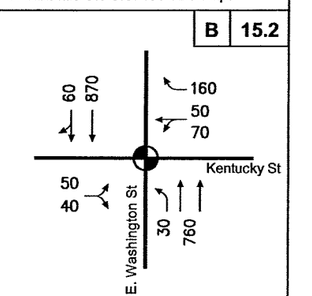

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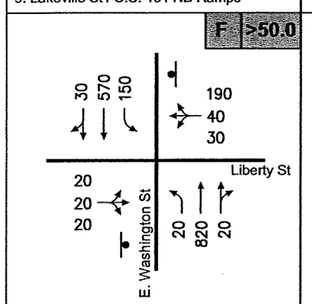

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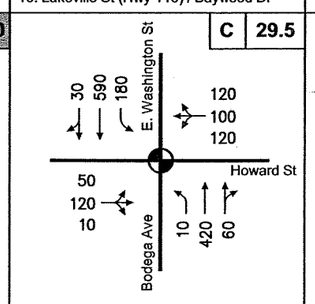

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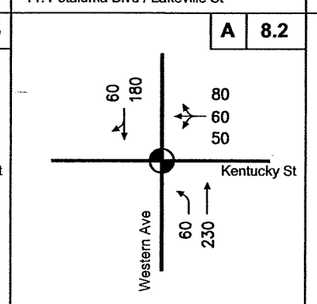

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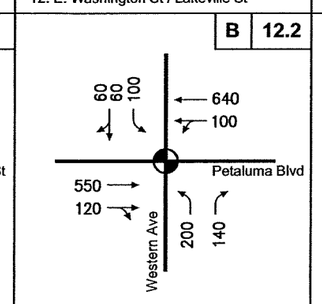

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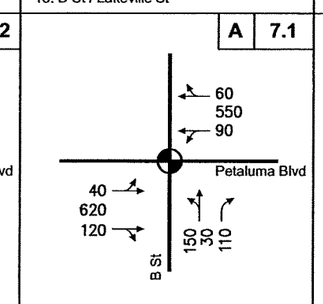

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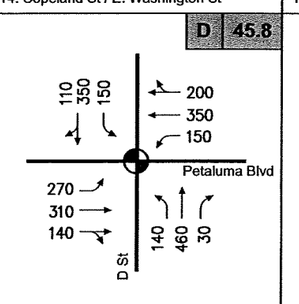

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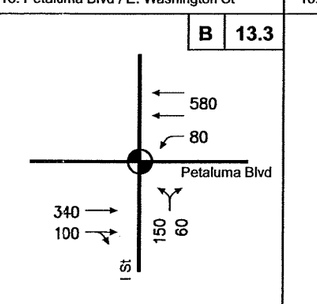

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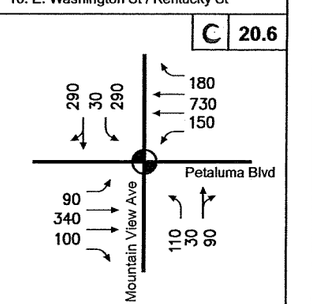

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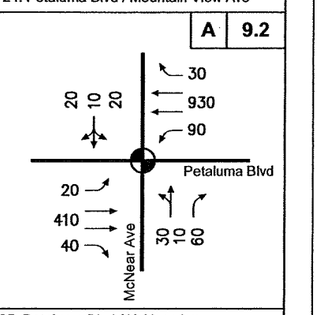

25. Petaluma Blvd / NcNear Ave

LEGEND:

= Signalized Intersection

= Stop Sign

= Turning Movement

XX = PM Peak Hour Traffic Volumes

C 20.4 = LOS Delay (veh/sec)

= Shaded boxes indicate intersections operating below the City's current level of service policy

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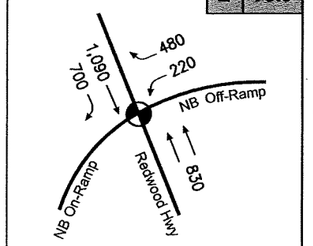
1027-0081/acadgraphics/0081-01 fig 8

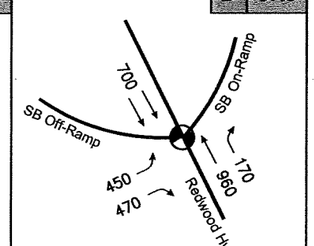
Central Petaluma SP EIR

PM PEAK HOUR TRAFFIC VOLUMES AND LANE CONFIGURATIONS CUMULATIVE NO PROJECT CONDITIONS

FIGURE 8



1. U.S. 101 NB Ramps / Redwood Hwy



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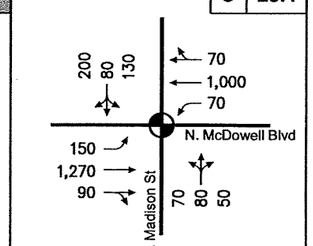
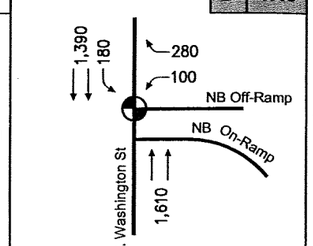


3. N. McDowell Blvd / E. Madison St



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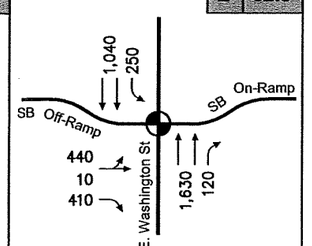

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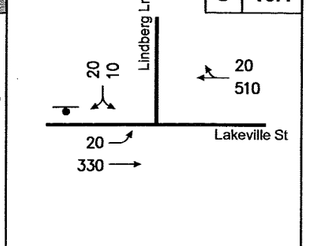
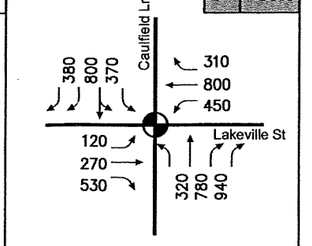


6. Lakeville St / Lindberg Ln



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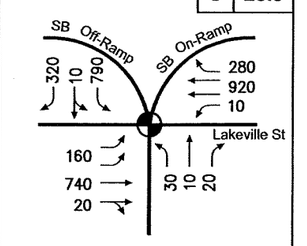

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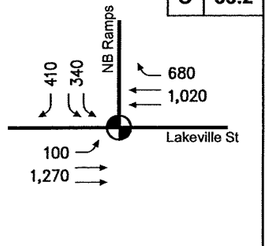

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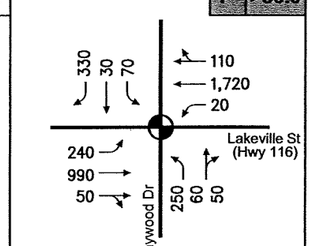

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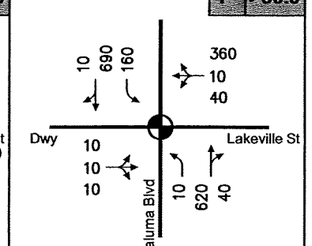
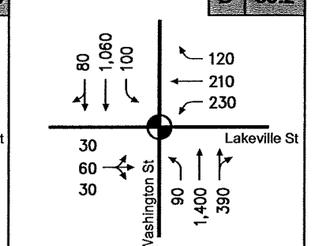


11. Petaluma Blvd / Lakeville St



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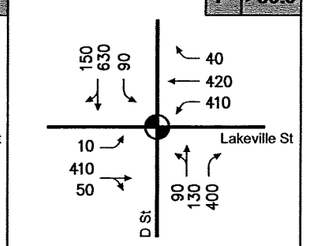
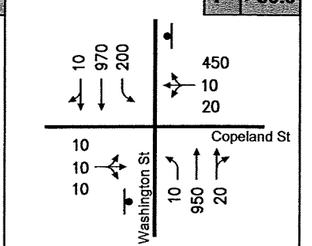
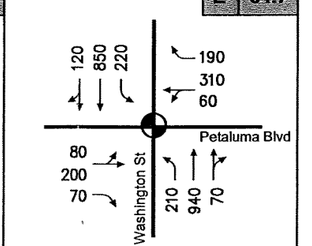


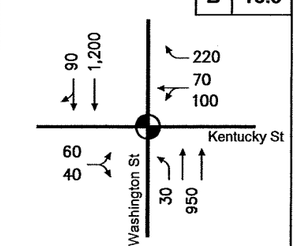
13. D St / Lakeville St



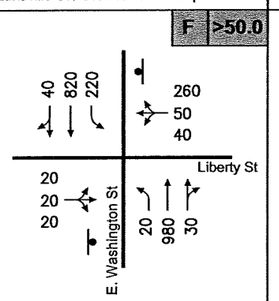
14. Copeland St / E. Washington St



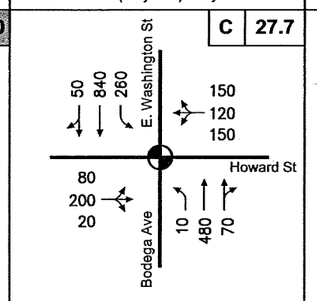
15. Petaluma Blvd / E. Washington St



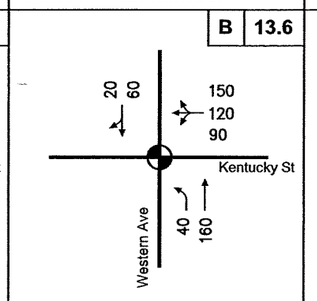
16. E. Washington St / Kentucky St



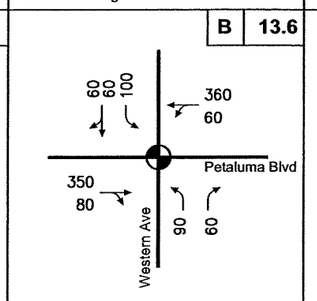
17. E. Washington St / Liberty St



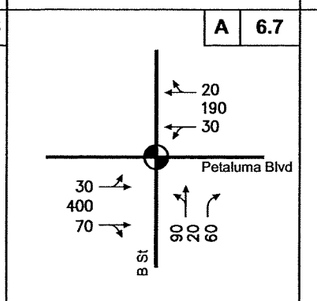
18.E. Washington St / Bodega Ave / Howard St



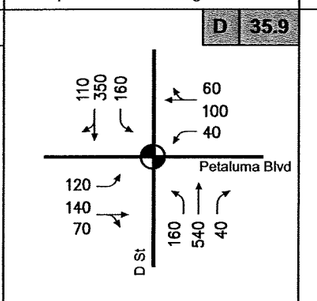
19. Western Ave / Kentucky St



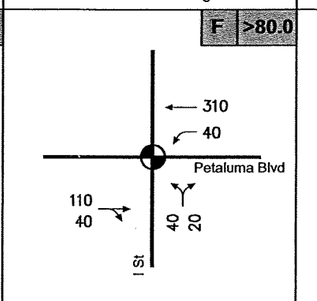
20. Petaluma Blvd / Western Ave



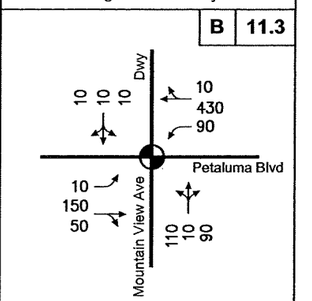
21. Petaluma Blvd / B St



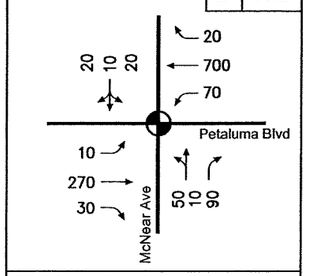
22. Petaluma Blvd / D St



23. Petaluma Blvd / I St



24. Petaluma Blvd / Mountain View Ave



25. Petaluma Blvd / NcNear Ave

LEGEND:

- = Signalized Intersection
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- XX = PM Peak Hour Traffic Volumes
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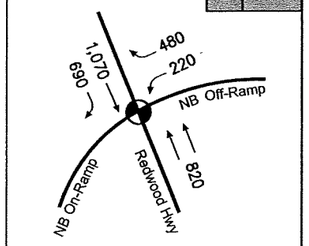
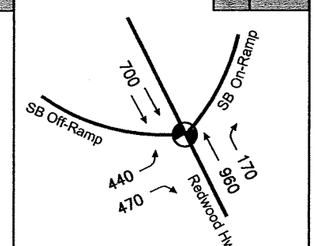
Central Petaluma SP EIR

PM PEAK HOUR TRAFFIC VOLUMES AND LANE CONFIGURATIONS CUMULATIVE PLUS PROJECT CONDITIONS (SCENARIO 1)

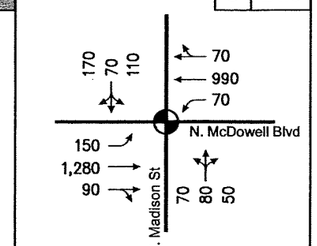
FIGURE 9



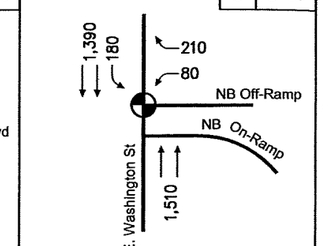
1. U.S. 101 NB Ramps / Redwood Hwy



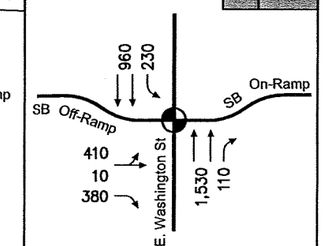
2. U.S. 101 SB Ramps / Redwood Hwy



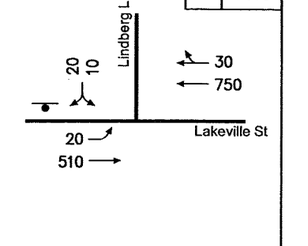
3. N. McDowell Blvd / E. Madison St



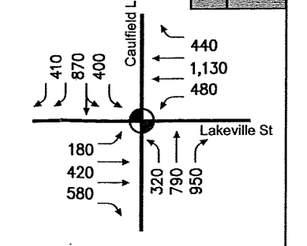
4. U.S. 101 NB Ramps / E. Washington St



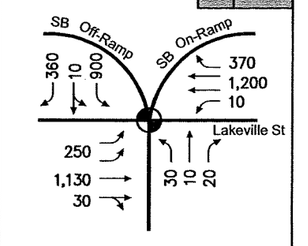
5. U.S. 101 SB Ramps / E. Washington St



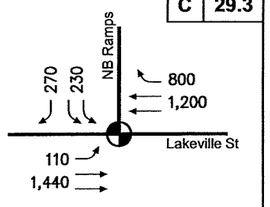
6. Lakeville St / Lindberg Ln



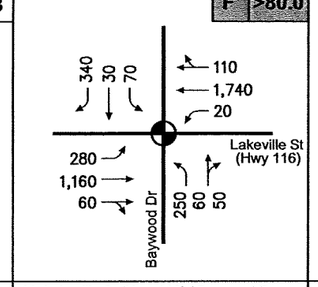
7. Lakeville St / Caulfield Ln



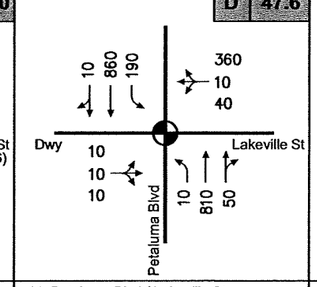
8. Lakeville St / U.S. 101 SB Ramps



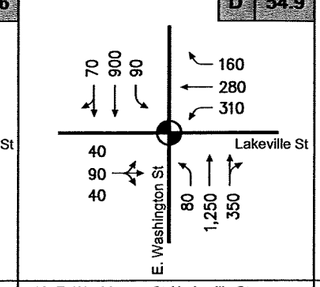
9. Lakeville St / U.S. 101 NB Ramps



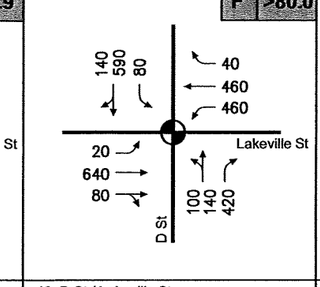
10. Lakeville St (Hwy 116) / Baywood Dr



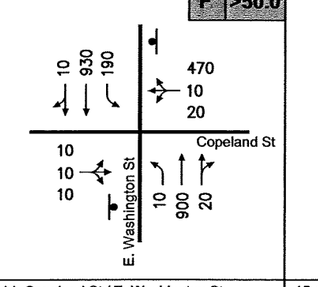
11. Petaluma Blvd / Lakeville St



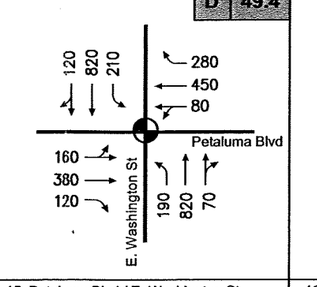
12. E. Washington St / Lakeville St



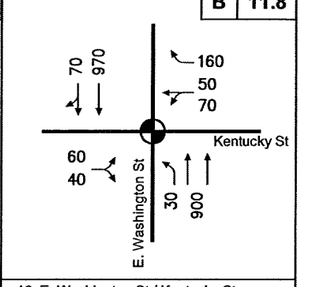
13. D St / Lakeville St



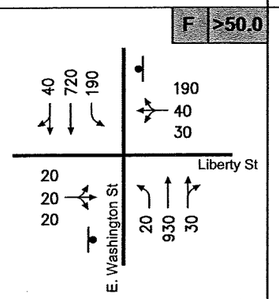
14. Copeland St / E. Washington St



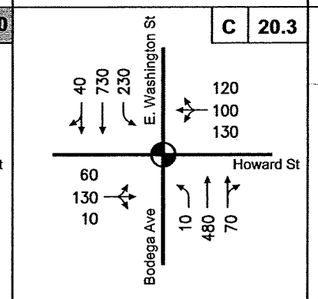
15. Petaluma Blvd / E. Washington St



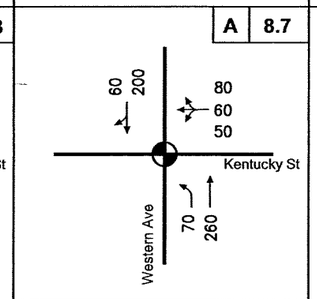
16. E. Washington St / Kentucky St



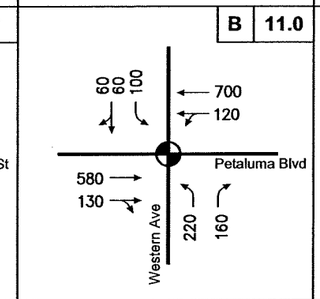
17. E. Washington St / Liberty St



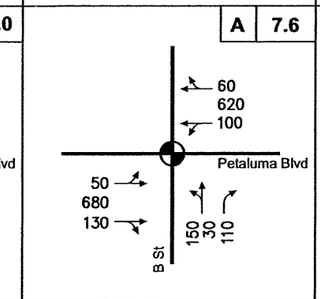
18.E. Washington St / Bodega Ave / Howard St



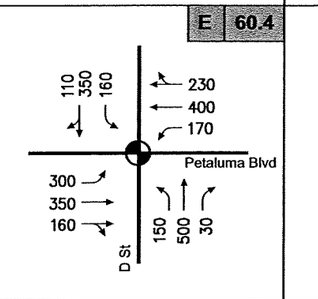
19. Western Ave / Kentucky St



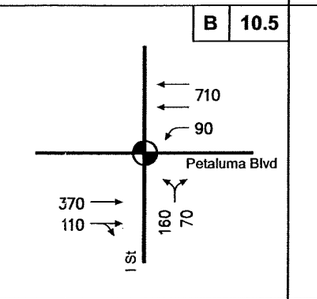
20. Petaluma Blvd / Western Ave



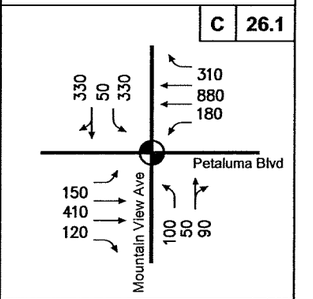
21. Petaluma Blvd / B St



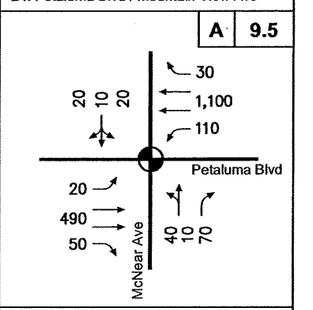
22. Petaluma Blvd / D St



23. Petaluma Blvd / I St



24. Petaluma Blvd / Mountain View Ave



25. Petaluma Blvd / NcNear Ave

LEGEND:

- = Signalized Intersection
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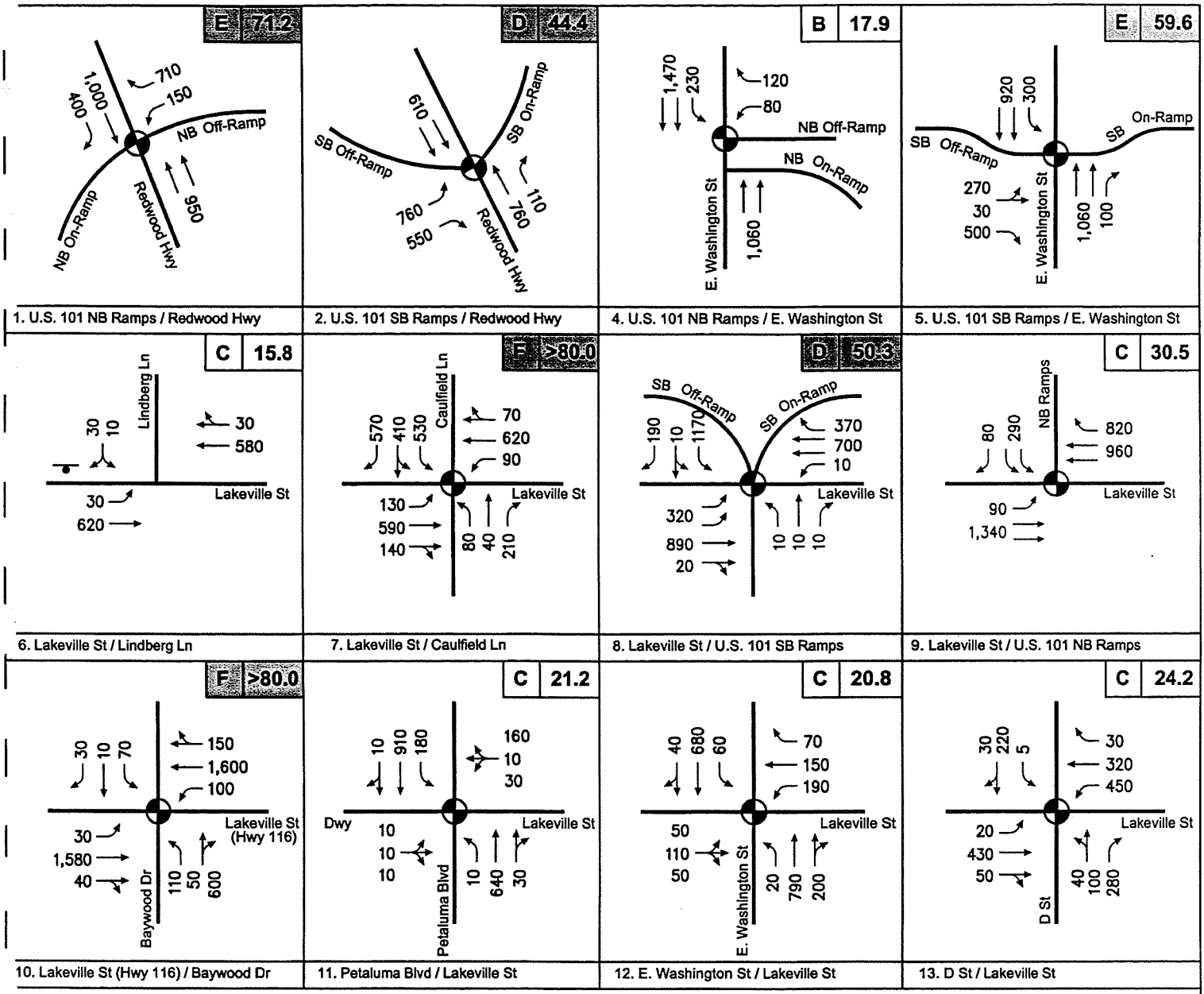
Central Petaluma SP EIR

PM PEAK HOUR TRAFFIC VOLUMES AND LANE CONFIGURATIONS CUMULATIVE PLUS PROJECT CONDITIONS (SCENARIO 2)

FIGURE 10



Central Petaluma SP EIR

AM PEAK HOUR TRAFFIC VOLUMES AND LANE CONFIGURATIONS CUMULATIVE NO PROJECT CONDITIONS

FIGURE 11

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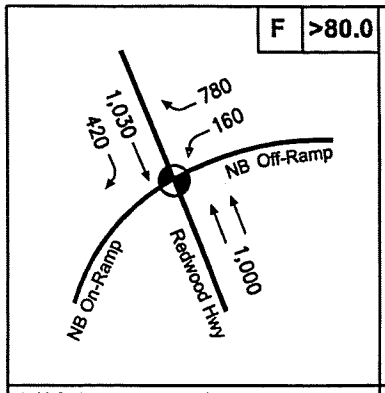
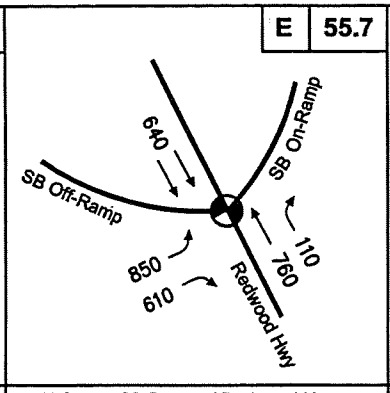
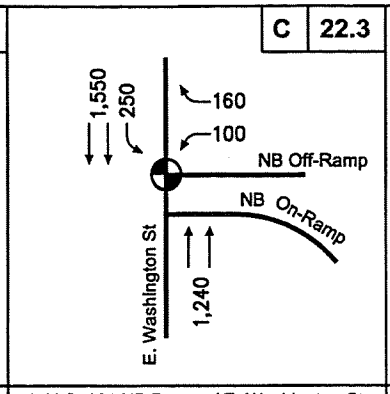
February 2003
1027-0081/acadgraphics/0081-01 fig 11



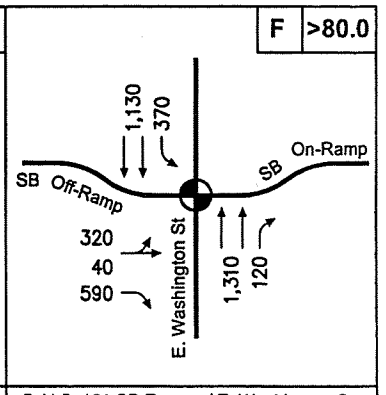
1. U.S. 101 NB Ramps / Redwood Hwy



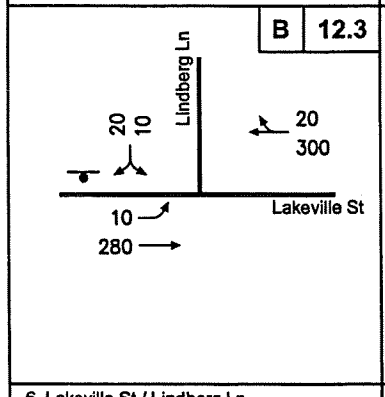
2. U.S. 101 SB Ramps / Redwood Hwy



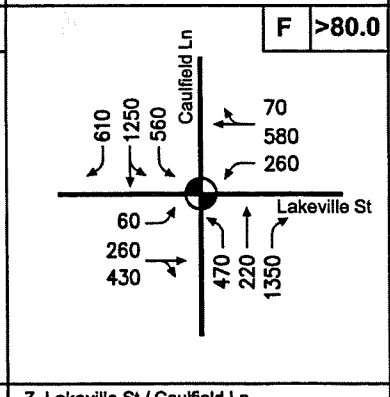
4. U.S. 101 NB Ramps / E. Washington St



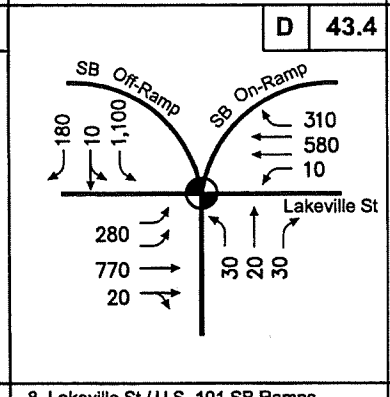
5. U.S. 101 SB Ramps / E. Washington St



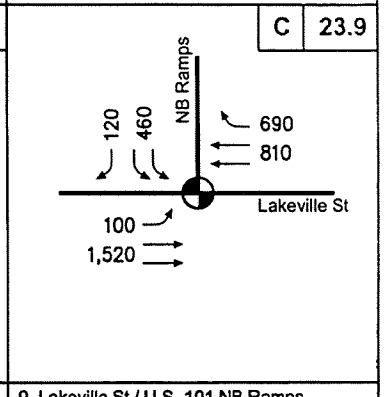
6. Lakeville St / Lindberg Ln



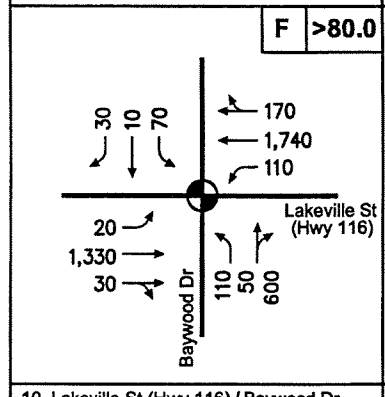
7. Lakeville St / Caulfield Ln



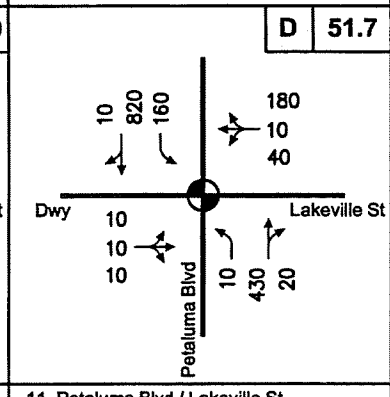
8. Lakeville St / U.S. 101 SB Ramps



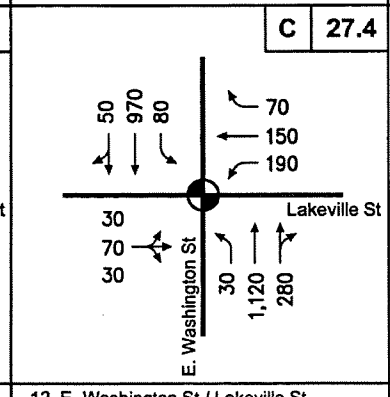
9. Lakeville St / U.S. 101 NB Ramps



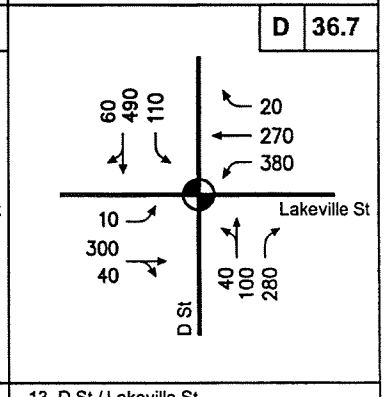
10. Lakeville St (Hwy 116) / Baywood Dr



11. Petaluma Blvd / Lakeville St



12. E. Washington St / Lakeville St



13. D St / Lakeville St

LEGEND:

= Signalized Intersection

= Stop Sign

= Turning Movement

XX = PM Peak Hour Traffic Volumes

C	20.4	=	LOS	Delay (veh/sec)

= Shaded boxes indicate intersections operating below the City's current level of service policy

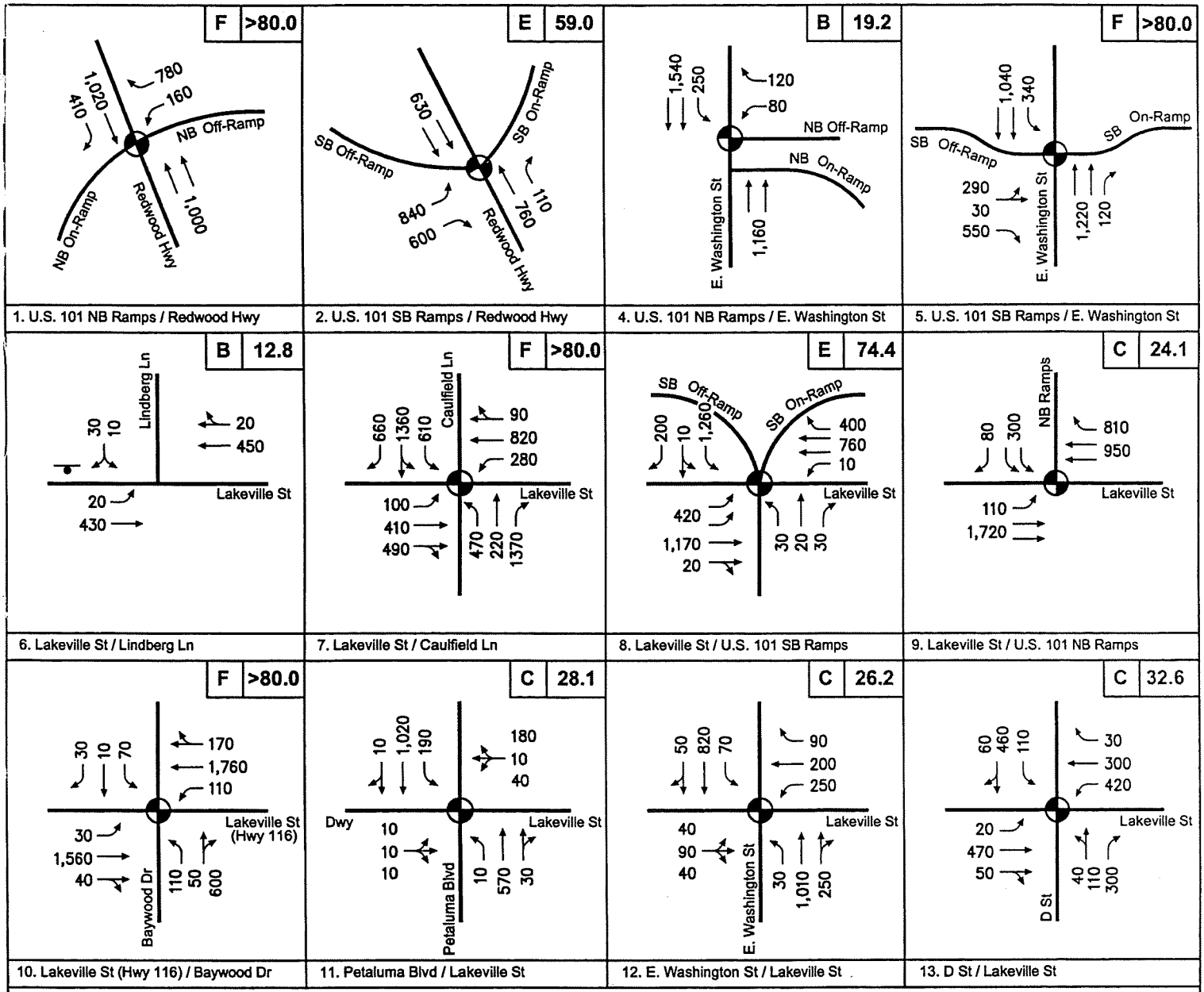
Central Petaluma SP EIR

FEHR & PEERS
TRANSPORTATION CONSULTANTS

AM PEAK HOUR TRAFFIC VOLUMES AND LANE CONFIGURATIONS CUMULATIVE PLUS PROJECT CONDITIONS (SCENARIO 1)

FIGURE 12

February 2003
1027-0081/acadgraphics/0081-01 fig 12



LEGEND:

- = Signalized Intersection
- = Stop Sign
- = Turning Movement
- XX = PM Peak Hour Traffic Volumes
- C | 20.4 = LOS | Delay (veh/sec)
- = Shaded boxes indicate intersections operating below the City's current level of service policy

Central Petaluma SP EIR

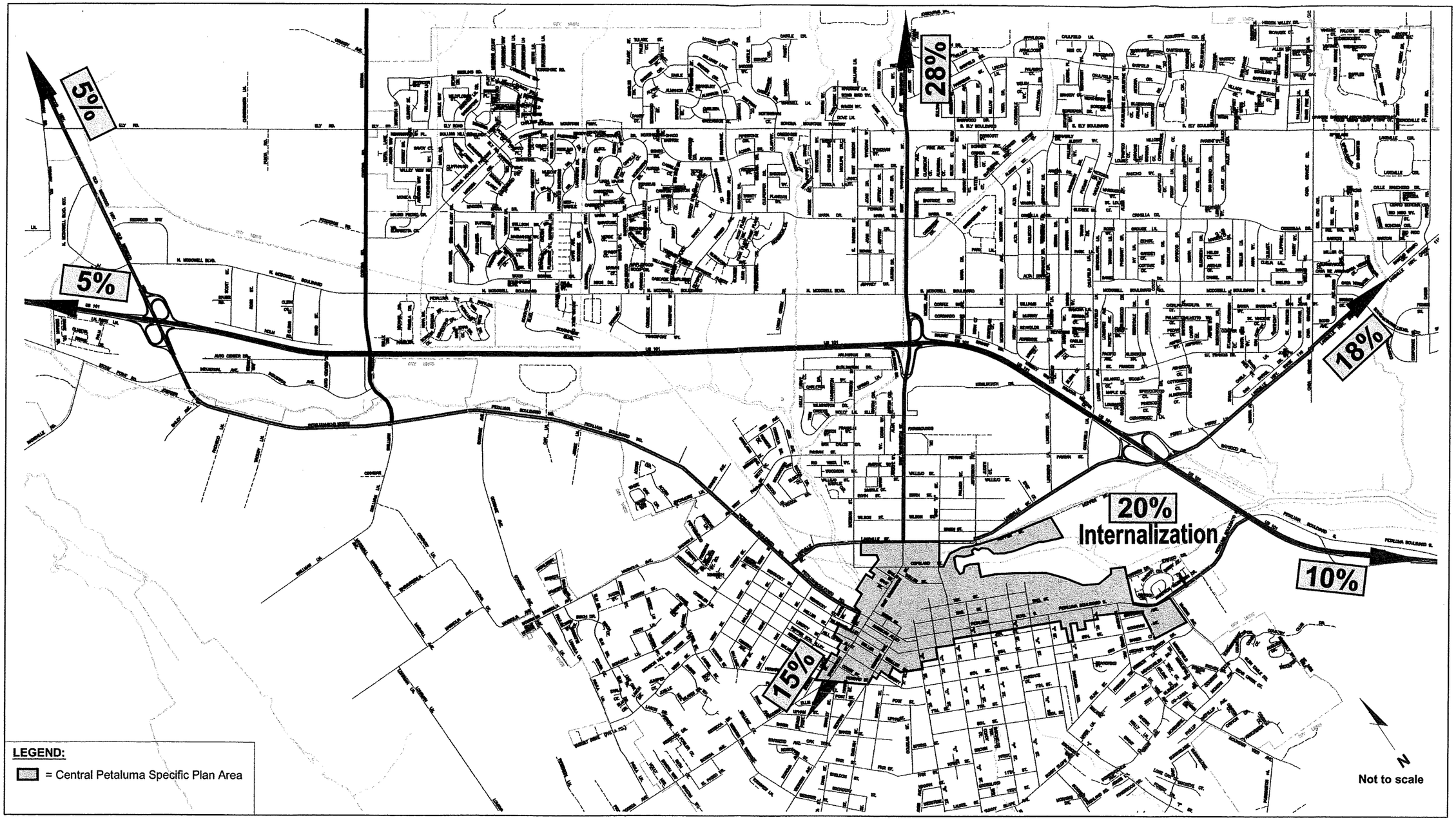
FEHR & PEERS
TRANSPORTATION CONSULTANTS

AM PEAK HOUR TRAFFIC VOLUMES AND LANE CONFIGURATIONS CUMULATIVE PLUS PROJECT CONDITIONS (SCENARIO 2)

February 2003

1027-0081/acadgraphics/0081-01 fig 13

FIGURE 13



FEHR & PEERS
TRANSPORTATION CONSULTANTS

February 2003
1027-0081/acadgraphics/0081-01 fig14

Central Petaluma SP EIR

TRIP DISTRIBUTION
FIGURE 14

7

April 21, 2003

Comments on the Draft Environmental Impact Report
Central Petaluma Specific Plan

From: Marianne Hurley
15 Howard St.
Petaluma, California

- The document does not adequately provide for the protection of historic architectural properties. Information is presented in the DEIR that historic properties will be adversely affected by significant impacts. There is no provision for adequate mitigation for this stated impact. 7.01

- This DEIR eliminates the usual CEQA process of requiring an EIR for projects that adversely affect historic resources, essentially eliminating the requirement to explore feasible alternatives to significantly impacting historic resources. A directed or focused EIR should be required when historic resources can be impacted. 7.02

- The identification of historic resources has not been definitively accomplished in the plan, making all statements about the "66 potentially historic resources" incorrect and misleading. 7.03

7. Memorandum from Marianne Hurley, 15 Howard Street, Petaluma; April 21, 2003

Comment 7.01: Draft EIR does not adequately provide for protection of historic architectural properties. There is no provision for adequate mitigation of Draft EIR stated significant adverse impact on historic resources.

> Response: In response to this and a number of similar more specific comments regarding this concern, revisions have been made throughout chapter 7 of the EIR (Cultural and Historic Resources) and, in particular, to Mitigation 7-2 for potential historic resources impacts, in order to ensure that all potential Specific Plan-related future impacts on historic resources are adequately mitigated. Please see responses herein to related comments PC.12, **PC.13**, **PC.15**, PC.16, PC.29, SP.02, and SP.03.

Comment 7.02: The Draft EIR eliminates the usual CEQA process of requiring an EIR for projects that may adversely affect historic resources, essentially eliminating the requirement to explore feasible alternatives to significantly impacted historic resources. A direct or focused EIR should be required when historic resources can be impacted.

> Response: Please see response to similar comment SP.02 herein.

Comment 7.03: Historic resources have not been definitively identified in the plan, making Draft EIR statements about "66 potentially historic resources" incorrect and misleading.

> Response: Please see responses herein to similar comments PC.13, PC.14, and 11.02.

8

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse

Gray Davis
Governor

Tal Finney
Interim Director

April 18, 2003

RECEIVED

APR 2 1 2003

COMMUNITY DEVELOPMENT DEPARTMENT

Mike Moore
City of Petaluma
11 English Street
Petaluma, CA 94952

Subject: Central Petaluma Specific Plan
SCH#: 2002112039

Dear Mike Moore:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on April 17, 2003, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly. 8.01

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

8

Document Details Report
State Clearinghouse Data Base

SCH# 2002112039
Project Title Central Petaluma Specific Plan
Lead Agency Petaluma, City of

Type EIR Draft EIR

Description The Specific Plan is intended to create a reinvigorated central district that accommodates a greater diversity and intensity of activities, including the continuation of traditional industries, as well as new environments for living and working in proximity to the downtown and the river. The Plan provides for a mix of new employment, housing, shopping and entertainment activities developed around the downtown, the riverfront warehouse district, and two future transit centers, located at the historic Petaluma Depot and on Caufield Lane.

Lead Agency Contact

Name Mike Moore
Agency City of Petaluma
Phone 707-778-4301 **Fax**
email
Address 11 English Street
City Petaluma **State** CA **Zip** 94952

Project Location

County Sonoma
City
Region
Cross Streets Lakeville Street, Petaluma Boulevard
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways U.S. Highway 101/SR 116
Airports Petaluma Municipal
Railways UPRR
Waterways Petaluma River
Schools Petaluma USD
Land Use GP: Industrial, Public Park, Public/Institutional, Mixed Use, Thoroghfare Comm. and Community Comm.; Zoning: CH (Highway Comm.); CC (Central Comm.); PUD (Planned Unit Distr.); ML (Light Industrial); AG (Agricult.); RW (Riv. Warehouse Distr.).

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Boating and Waterways; Department of Fish and Game, Region 3; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 4; Department of Housing and Community Development; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 03/04/2003 **Start of Review** 03/04/2003 **End of Review** 04/17/2003

Note: Blanks in data fields result from insufficient

8. Letter from Terry Roberts, Director, State Clearinghouse, State of California Governor's Office of Planning and Research; April 18, 2003

Comment 8.01: Notification that state review period closed on April 17, 2003, and transmittal of letters from all state agencies who commented, including letters 6 (Caltrans) and 9 (State Department of Toxic Substances Control) responded to herein.

Letter acknowledges that City has complied with State Clearinghouse review requirements pursuant to CEQA.

> Response: Comments acknowledged. See responses herein to letters 6 and 9. No further Final EIR written response is required.

9

Department of Toxic Substances Control

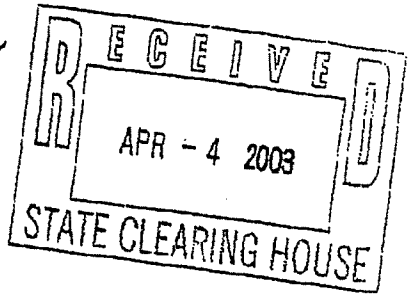
Edwin F. Lowry, Director
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

April 4, 2003

Clear
4.17.03
e



Mr. Michael Moore
City of Petaluma
11 English Street
Petaluma, California 94952

Dear Mr. Moore:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Central Petaluma Specific Plan (SCH# 2002112039). As you may be aware, the California Department of Toxic Substances Control (DTSC) oversees the cleanup of sites where hazardous substances have been released pursuant to the California Health and Safety Code, Division 20, Chapter 6.8. As a Resource Agency, DTSC is submitting comments to ensure that the environmental documentation prepared for this project to address the California Environmental Quality Act (CEQA) adequately addresses any required remediation activities which may be required to address any hazardous substances release.

After review of the Environmental Impact Report, DTSC has the following comments regarding Section 14 Hazardous Materials:

1. Subsections 14.1.2 and 14.3.2 refer to polychlorinated biphenyls (PCBs), asbestos, and lead as being potential contaminants of concern. In addition to the survey to determine if asbestos and PCBs are present within the Specific Plan area, we recommend that a lead assessment also be conducted. Please include this in the discussion. 9.01

2. On April 19, 2003, Land Use Covenant regulations (Section 67391.1, Title 22, Division 4.5, Chapter 39 of the California Code of Regulations) become effective. These regulations will require that land use covenants be imposed on lands which are not suitable for unrestricted use. Please review these regulations and modify the Draft Environmental Impact Report accordingly. 9.02

9

3. In addition to direct human contact, soil contamination should be evaluated to determine the potential impact of vapor intrusion into the buildings, migration into groundwater, and the discharge of the contaminants to surface water bodies or park areas. 9.03

4. Lastly, it is important that any utility trenches or elevator shafts have clean soil to avoid the need for 40-hour OSHA training for construction and future repair of these systems. 9.04

Please note that the statutory authority provided under the Health and Safety Code, Division 20, Chapter 6.8, has not been delegated to the Certified Unified Program Authority (CUPA).

DTSC can assist your agency in overseeing characterization and cleanup activities through our Voluntary Cleanup Program. A fact sheet describing this program is enclosed. We are aware that projects such as this one are typically on a compressed schedule, and in an effort to use the available review time efficiently, we request that DTSC be included in any meetings where issues relevant to our statutory authority are discussed. 9.05

If you have any questions please call Xavier Bryant at (510) 540-3835.

Sincerely,

Barbara J. Cook, P.E., Chief
Northern California – Coastal
Cleanup Operations Branch

cc: without enclosures

Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Guenther Moskat
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

9. Letter from Barbara J. Cook, P.E., Chief, Northern California--Coastal Cleanup Operations Branch, State Department of Toxic Substances Control; April 4, 2003

Comment 9.01: Lead assessment requirement should be added to subsection 14.1.2 and 14.3.2 discussion.

> Response: Comment acknowledged. Please see associated revisions to subsections 14.1.2 and 14.3.2, including pages 14-1, 14-2, 14-3, 14-7, and 14-8, in section 3 herein (Revisions to the Draft EIR), made in response to this comment.

Comment 9.02: Review new April 19, 2003 Land Use Covenant regulations and modify Draft EIR accordingly.

> Response: These covenants had not yet been officially adopted at the time of the Notice of Preparation (NOP) for this EIR, and thus need not be included in the document to achieve CEQA compliance. However, the covenants will be properly addressed during the City's subsequent (future) site-specific development review process.

Comment 9.03: Soil contamination should be evaluated to determine potential impact of vapor intrusion into buildings, migration into groundwater, and discharge of contaminants to surface water bodies or park areas.

> Response: These possible soil contamination impacts are adequately anticipated and inherently addressed in the existing soil contaminants discussion on pages 14-6 and 14-7 of the Draft EIR.

Comment 9.04: Important that any utility trenches or elevator shafts have clean soil to avoid need for construction period/future repair OSHA training.

> Response: Comment acknowledged. This concern would be inherently and adequately addressed through the soil contamination evaluation and remediation procedures already described on Draft EIR pages 14-6 and 14-7.

Comment 9.05: Offer of future DTSC assistance to City in overseeing future characterization and cleanup activities.

> Response: Comment acknowledged. The City is aware and appreciative of the availability of DTSC assistance in overseeing future hazardous materials characterizations and cleanup activities in the Specific Plan area.

10

WESTERN OFFICE

NATIONAL TRUST
for HISTORIC PRESERVATION

April 21, 2003

By e-mail and Mail

Mike Moore, Director
Community Development Department
City of Petaluma
11 English Street, Petaluma, California 94952
mmoore@ci.petaluma.ca.us

RE: **Draft Environmental Impact Report – "Central Petaluma Specific Plan"**

Dear Mr. Moore:

Thank you for the opportunity to comment on the "Central Petaluma Specific Plan" and its Draft Environmental Impact Report (DEIR). As we only obtained a copy of the documents last week, these comments reflect a somewhat rushed review. Given time limitations, our comments below incorporate the Specific Plan, the "Smart Code", and the DEIR. We have excluded impacts on archeological resources from these comments.

10.01

Since the DEIR serves as a public disclosure comment, we suggest that the City of Petaluma make a greater effort to make the document known and available to the public. Visits to the city's website during the past two weeks failed to find copies of the DEIR or the Specific Plan, nor are there references to their existence and the current review process. Likewise, the hard copy of the DEIR does not indicate the comment period or where comments should be sent.

10.02

Broadly speaking, the National Trust supports the major planning concepts driving the Central Petaluma Specific Plan, but we are concerned that the plan underemphasizes the protection of historic resources, and that the "program EIR" approach could actually result in accelerated loss of these resources. Our specific comments on the three documents follow.

10

Central Petaluma Specific Plan

Overview of Specific Plan

The National Trust supports the Specific Plan's goal to reinvigorate central Petaluma by encouraging a greater diversity and intensity of activity while providing a place that is "uniquely Petaluma" (Specific Plan Final Draft, page 4). Specifically, we support goals to encourage mixed uses, emphasize small-scale development, respect existing industrial uses, and discourage automobile-dependency. Nonetheless, while the plan incorporates a chapter on historic preservation and a goal to protect historic resources, we are disappointed that it does not explicitly highlight historic preservation as a core element of the plan. The plan overview makes reference to central Petaluma's "interesting" and "unique sense of place" (Specific Plan Final Draft, page 8) without underscoring that these qualities are overwhelmingly derived from the area's rich historic resources.

As the plan suggests, there is indeed a great opportunity to complete a fragmented urban pattern in Central Petaluma, and greater density and flexibility in land use should be an important part of the planning strategy. However, we are concerned that language in the Final Plan Introduction suggests that the plan's goals can be accomplished "without constraining developments." It is our understanding that the Specific Plan seeks to encourage development of a certain prescribed character; development that does not contribute to the plan's goals should indeed be constrained. Specifically, the plan should clearly state that new development must not come at the expense of existing historic resources. It is these resources--and not new infill construction--that are the key to fostering and maintaining a place that is "uniquely Petaluma".

Historic Preservation Chapter

We note that the purpose of the chapter is merely to "identify potential historic resources within the Specific Plan area." While the preservation Goal and Objectives are legitimate, the ensuing text is largely descriptive of the resources, offering little in the way of strategies to assure that the goals and objectives are met. Likewise, there does not appear to be any attempt to assess the potential impact of the overall Specific Plan on historic resources.

Among our specific concerns:

- The Carey & Company survey provides the basis for determining historical significance; it should be included as an appendix. This survey appears to be a

10

reconnaissance survey[1]; an intensive survey should be conducted and the plan should be amended to reference it.

- We disagree that the proposed North River local historic district "defies the accepted approach to design standards due in large measure to the priority given to functionality and economy over pure design considerations." (Specific Plan Final Draft, page 106) Design standards are just as critical in preserving vernacular and industrial buildings, streetscapes, and landscapes as they are for high-style, "designed" properties; examples of such design guidelines abound. The National Trust can provide examples of comprehensive design standards used in other communities.
- The plan rightly states that the remaining railroad tracks in the plan area are "of note", but fails to explicitly call for their preservation.
- The chapter should explicitly state that any project resulting in the demolition of historic resources, or project that fails to adhere to the *Secretary of the Interior's Standards for Treatment of Historic Properties*, is inconsistent with the Specific Plan and requires consideration of a range of alternatives in an EIR.

Smart Code

As is the case with the Specific Plan, the proposed Smart Code represents a genuine effort to reshape land use policy in a way that is more responsive to reusing historic buildings and encourages new development that is compatible with historic development patterns and results in a more livable community.

One of the greatest threats to older buildings has been compliance with "modern" zoning and building codes written without regard for historic building types and development patterns. We commend the effort to develop new codes that might reinforce rather than threaten the historic character of central Petaluma. Nonetheless, we are very concerned that the code may be creating new planning conflicts that increase pressures to demolish or degrade historic properties lower in density than new development envisioned by the plan.

Among our specific concerns:

---

[1] Historic resources surveys fall into two general types: reconnaissance-level surveys and intensive-level surveys. A reconnaissance-level survey is a first step in the survey process that identifies those areas and properties worthy of further study. Because reconnaissance-level surveys do not typically include research on the histories of the surveyed resources, they do not provide sufficient information for making informed evaluations of historic significance. Intensive-level surveys include historical research on the surveyed properties that provides the information needed for determining which individual properties and areas are eligible for historic designations and for defining the boundaries of any historic districts.

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- The meaning of the "applicability" section (7.10.020) is unclear: When is demolishing a historic resource "in compliance with the provisions of the Specific Plan"?
- The Historic Resource Conservation & Preservation provisions would create a dual track for Petaluma's preservation program. The boundaries of the Specific Plan area did not take into account the distribution of historic resources. Most notably, the area boundary cuts right through the center of the Petaluma Historic Commercial District. What rationale is there for applying different rules to portions of the historic district inside and outside the Specific Plan area?
- The Specific Plan and the Smart Code offer little information regarding the proposed urban standards vis-à-vis existing conditions. While the Specific Plan represents an intentional effort to increase the overall density of central Petaluma, it also states a goal to "protect, enhance, perpetuate, and use" historic properties. If this is to indeed be a "smart" code, allowable building heights must be consistent with existing historical patterns, helping to ensure that the association, feeling, and setting of the historic district are protected.
- The provision of a range of incentives for historic properties is laudable; the following additional incentives should be considered:
  1. Parking requirements often represent the chief impediment to full use of historic properties; an immediate waiver of minimum parking requirements should be granted to rehab projects for historic properties.
  2. Creation of a transfer of development rights (TDR) program, allowing density to be transferred from low density historic properties to other parts of the planning area where higher density is to be encouraged. (In order to function, the density possible by buying development rights must exceed the density otherwise achievable by the Smart Code.)

Draft Environmental Impact Report

We are extremely concerned that the formulation of a programmatic EIR for the Specific Plan may have the ultimate effect of undermining protection of historic resources. The Specific Plan, which represents a "project" subject to CEQA, leaves the door wide open for tiered projects that result in "significant, unavoidable impacts" to historical resources without adequate consideration of alternatives. 10.03

Despite extensive language speaking to the importance of the planning area's historic resources, the DEIR assumes "substantial, adverse changes" to historic resources—including "physical demolition, destruction, relocation, or alteration" (DEIR 7.3.2)—without consideration of a broad range of alternatives. Lacking such evidence, it is not clear why demolition of historic properties is anticipated or how such actions can be deemed "pursuant to and in conformity with" a Specific Plan purporting to "protect, enhance, perpetuate, and use properties of historic and architectural significance" (Specific Plan Final Draft, page 104). 10.04

10

The DEIR is quite explicit in stating that one purpose of this EIR is to "avoid or reduce the need for additional environmental review for future projects within the Specific Plan area undertaken pursuant to and in conformity with the proposed specific plan...", and that "this EIR is intended to streamline the review of such projects and reduce the need to prepare repetitive environmental studies" (DEIR 7.3.2(b)). However, anecdotal evidence suggests that it is precisely the requirement to prepare such studies that has resulted in the preservation of historic properties in Petaluma. If the Specific Plan truly seeks to protect historic properties, the EIR should explicitly state that any future action that results in a "substantial adverse change" in a historic resource is not "in conformity" with the Specific Plan, and thus requires preparation of a project-specific EIR. 10.05

While we support the DEIR's requirement that the *Secretary's Standards* be applied to projects causing a "substantial adverse change" under CEQA Guidelines section 15064.5, it appears that projects resulting in demolition of historic resources would require no further environmental review beyond the Initial Study process. Mitigation Measure 7-2 states that if the City determines through the Initial Study process that the *Secretary's Standards* cannot be successfully applied, the "potential for building demolition and resulting effects on historic resources and/or historic districts would therefore represent a ***significant, unavoidable impact.***" In other words, if the City decides that the *Secretary's Standards* cannot be met, demolition will be allowed to proceed without consideration of other alternatives in an EIR subject to public review and comment. 10.06

Although the National Trust supports application of the *Secretary's Standards* wherever possible, we are concerned that the DEIR encourages an "all or nothing" approach, whereby demolition is viewed as the next-best alternative if a project cannot be accomplished in full conformity with the standards. If the standards cannot be met, less drastic alternatives should be evaluated prior to considering demolition, including additions, interior renovation, relocation, and partial demolition/new construction. Documentation of these evaluations should be made available to the public for review and comment in an EIR.

Sincerely,

Anthony Veerkamp
Senior Program Officer

Michael Buhler
Regional Attorney

10. Letter from Anthony Veerkamp, Senior Program Officer, and Michael Buhler, Regional Attorney, Western Office, National Trust for Historic Preservation; April 21, 2003

Comment 10.01: City should make a greater public notification effort re: the availability of the Draft EIR for public review; no references to Draft EIR availability on City's website; no indication of public comment period on Draft EIR.

> Response: The City has complied with all normal Draft EIR notification requirements set forth in state and City CEQA Guidelines, including publishing a notice of Draft EIR availability in a newspaper of general circulation, and circulation of a Notice of Preparation to the State Clearinghouse and to all known responsible and trustee agencies. In response to this comment, the City should consider revising its guidelines for implementation of CEQA to include a requirement that Draft EIR documents or a notice of their availability also appear on the City's official website.

Comment 10.02: Program EIR approach may result in accelerated loss of historic resources; as explained in specific comments below.

> Response: The EIR authors are highly aware of this concern and have explained how refinements have been made to the Draft EIR in response to this and similar comments to ensure that this is not the case. For further explanation, please see responses to the related, more detailed comments 10.03 through 10.06 which follow, and the responses elsewhere herein to similar comments PC.03, PC.15, SP.02, and SP.03.

Comment 10.03: Formulation of program EIR for Specific Plan may have ultimate effect of undermining protection of historic resources, including "physical demolition, destruction, relocation or alteration" (DEIR section 7.3.2) without consideration of broad range of alternatives.

> Response: Comment acknowledged. Refinements have been made to chapter 7 (Cultural and Historic Resources) of the Draft EIR to ensure that the EIR will not have, and not be perceived to have, this undesirable effect. Please see responses herein to similar comments SP.02 and PC.15, which describe how the language in the Draft EIR, especially Draft EIR pages 7-8 and 7-9, has been revised to eliminate any perception that future, site-specific actions resulting in the demolition of a CEQA-defined historic resource, or resulting in a historic resource being "materially impaired," would be allowable under this Specific Plan EIR with no future CEQA compliance requirement. The EIR language has been revised to clarify that, in such cases, preparation of a project-specific EIR would be required. Also, under CEQA, the required project-specific EIR would be required to identify and evaluate possible mitigating alternatives to demolition, such as adaptive re-use of the historic resource.

Comment 10.04: Unclear why demolition of historic properties is anticipated or how such activities can be deemed "pursuant to and in conformity with" a Specific Plan purporting to

"protect, enhance, perpetuate, and use properties of historic and architectural significance" (Specific Plan Final Draft, page 104).

> Response: The draft Specific Plan language does not preclude (prohibit) demolition of historic properties. Rather, the plan includes policies calling for the redevelopment and intensification of the area, and policies calling for the protection of historic resources. The City (City Council) will have the future discretion to consider both of these objectives and strike a desirable balance between them when considering future development proposals that may include demolition of, or adverse effects on, a historic resource.

Comment 10.05: Draft EIR explicitly states intent to streamline the future environmental review process and "reduce the need to prepare repetitive environmental studies" (DEIR section 7.3.2(b)). However, anecdotal evidence suggests that it is precisely the requirement to prepare such studies that has resulted in the preservation of historic properties in Petaluma. EIR should explicitly state that any future action that results in a "substantial adverse change" in a historic resource is not "in conformity with the Specific Plan," and thus requires preparation of a project-specific EIR.

> Response: Please see response to comment 10.03 above and to similar comments SP.02 and PC.15.

Comment 10.06: Appears that under Draft EIR language, projects resulting in demolition of historic resources would require no further environmental review beyond Initial Study process. Mitigation 7-2 states that if City determines through Initial Study process that Secretary's Standards cannot be successfully applied, the "potential for building demolition and resulting effects on historic resources and/or historic districts would therefore represent a ***significant unavoidable impact.***" In other words, if standard cannot be met, demolition will be allowed to proceed without consideration of other alternatives in an EIR subject to public review and comment.

> Response: Please see response to comment 10.03 above and to similar comments SP.02 and PC.15.

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DIANA J. PAINTER
Architectural Research, Preservation Planning, Urban Design

April 21, 2003

Mr. Michael Moore
Planning Director
City of Petaluma
11 English Street
Petaluma, CA 93952

Re: Central Petaluma Specific Plan DEIR

Dear Mr. Moore:

The following are my comments and concerns regarding the Central Petaluma Specific Plan DEIR.

Historic Resources

A windshield survey was conducted to identify potential historic structures to be addressed in the Central Petaluma Specific Plan. A resource does not have to be formally identified to be considered under CEQA ("*The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historic resource . . . " (21084.1 Historical Resource Guidelines, California Public Resources Code)).*

11.01

A historical resource can be identified as significant in historical resource surveys, if the survey meets the following criteria:

(1) The survey has been or will be included in the State Historic Resources Inventory.
(2) The survey and the survey documentation were prepared in accordance with office procedures and requirements.
(3) The resource is evaluated and determined by the office to have a significance rating of Category 1 to 5 on DPR Form 523.
(4) If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource. (California Resource Code Section 5024.1(g)).

My point is that, while a resource does not have to have been formally identified to be considered under CEQA, a resource survey has to meet certain standards to be considered adequate. The survey conducted here does not meet standard #3 above; nonetheless National Register significance criteria were assigned to the resources.

11.02

To be properly documented, a resource must be evaluated under National or California Register criteria that includes: (1) an association with events that have made contributions to the broad

2685 A Petaluma Blvd. North - Petaluma, CA 94952 - (707) 658-0184 - d.painter15@attbi.com

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patterns of history; (2) an association with the lives of persons important in our past; (3) embodies distinctive architectural values; and/or (4) may yield important information about prehistory or history (Petaluma also uses this criteria). This is more detailed and comprehensive research than is possible in a windshield survey.

My concern is that there is no documentation that substantiates that the 66 potential historic resources identified in the Central Petaluma Specific Plan are the only historic resources in the plan area; Status Codes were assigned without full consideration of the evaluation criteria required by law; and lastly, this may be misleading to the public and imply that full consideration of each potential resource and its significance was made. 11.03

I understand that the Plan does not preclude future detailed evaluations of resources, nor does it preclude future comprehensive surveys of potential districts. What is lost in an individual case-by-case study of an individual property, which is advocated with this Plan, is an understanding of the value of this area to the history of Petaluma; its social and economic history as well as physical artifacts that represent this history; and an ability to make good, substantiated decisions about the relative value of these potential historic resources. In other words, mitigation has been established without knowing the full extent of the value of the resource, information that would be supplied in a proper inventory or in a treatment under CEQA that met the guidelines outlined above. 11.04

I recommend that the City conduct a Historic Resource Survey that meets City and State guidelines and consider the potential historic districts as part of the mitigation package, so full knowledge of the resources will inform future discretionary actions. This will give more concrete guidance to property owners and developers who want to redevelop, and would probably facilitate development activities. Without good information and proper disclosure, future development activities may be challenged on the issue of historic resources on a project-by-project basis. 11.05

I have previously commented on the Central Petaluma Specific Plan (see letter dated March 27, 2003). The only additional comment I would like to make at this time is the adequacy of the DEIR based on a projected 25% build-out of the project area within the 20 year planning horizon. This is a low projection. The reason I say this is: 11.06

- There are large acreages within the plan area that are completely vacant, and therefore easy to develop;
- There are large acreages within the plan area with urban services, and therefore less costly to develop;
- This plan strives to eliminate impediments to development, by developing the programmatic EIR and eliminating some levels of review that currently occur for redevelopment activities.

If the block that the train depot sits on (bounded by E. Washington, Lakeville, D Street and Copeland) were redeveloped, for example, that would represent 2% of the planning area, in terms of acreage. While many properties will continue at a low level of development density due to provisions to protect agriculture and industry, others will be able to develop at a greater density. I suggest that the Plan and EIR demonstrate in more detail why impacts based on a 25% build-out are considered adequate for the impact analysis.

Thank you for the opportunity to comment. I hope that this plan and planning process protects Petaluma's history, diverse economy, and accessible, walkable urban areas while supporting the type of redevelopment that will enhance Petaluma's future.

2685 A Petaluma Blvd. North - Petaluma, CA 94952 - (707) 658-0184 - d.painter15@attbi.com

11

Sincerely,

Diana Painter

Diana Painter

Attachment:

Letter of March 27, 2003

2685 A Petaluma Blvd. North - Petaluma, CA 94952 - (707) 658-0184 - d.painter15@attbi.com

11

COMMENTS ON CENTRAL PETALUMA SPECIFIC PLAN/EIR
Historic SPARC Meeting, March 27, 2003

Historic Preservation

Petaluma Train Depot. The Plan states that "Plans and designs should comply with the Secretary of Interior's Standards for the Treatment of Historic Properties." (p. 109). This should read *"shall"*. The Depot is owned by Sonoma-Marin Area Rail Transit. Work done on railroad land, under their ownership, will be required to meet the Secretary of Interior's Standards, and additionally be subject to Section 106 Review, due to the potential for Federal funding. Section 106 Review requires a more detailed look at a project's context, and State concurrence with findings.

Riverfront Warehouse District. The inventory work that was conducted in the Riverfront Warehouse District area to document potential historic resources was not at a level of detail sufficient for planning purposes. The buildings were not inventoried, in the sense that a Primary Form (DPRa) was prepared, or evaluated, in the sense that a Building, Object, Structure Form (DPRb) was prepared. Yet a ranking based on the NRHP Status codes was applied to the structures in the district. Buildings ranked 6Z, for example, were "Found ineligible for listing in the National Register through an evaluation process other than those mentioned in 6X and 6Y (6X – determined ineligible by Keeper of the Register; 6Y – determined ineligible by a federal agency and SHP officer). This is inappropriate given the level of review in the inventory.

11.07

Under CEQA, historic resources are not precluded from review just because they have not been determined to be an historical resource through formal means: "The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in the Public Resources Code sections 5020.1(j) or 5024.1."

Nonetheless, the Public Resources Code here refers to the requirements historical resources must meet to be listed on the California Register, including meeting National Register of Historic Places criteria. This criteria includes a resource's association with events important to history, association with persons important in history, a resource be architecturally significant, or important as a source of information in prehistory or history. Assigning National Register Status Codes implies to me that a full evaluation of the resources has been done, taking into account these factors, where in fact the survey was just a windshield survey. At this level of detail, age and integrity should be the primary factors considered. Appearance alone does not yield the type of information needed to assign Status Codes.

11

A solution would be to eliminate the rankings from the spreadsheets, and plan to conduct a full inventory of potential historic resources in the project area, so informed decisions can be made as to the potential to impact resources at the plan or project level.

Railroad Right-of-way *(corrections)*
The right-of-way and land areas that were formerly owned by the NWPRR and controlled by that entity and the Golden Gate Bridge Highway Transportation District have now been taken over by the Sonoma-Marin Area Rail Transit, and a new entity made up of members of the SMART Commission and the Golden Gate Bridge District.

SMART has a mandate to plan for a bike path parallel to the rail right-of-way as part of its planning *(p. 59)*.

Light rail is not being planned as a part of the SMART project. It is a commuter rail service, with an emphasis on half hour headways during the peak hours *(the headways listed are not correct)*. Two stations are proposed in Petaluma, not three. And the passenger projections are no longer valid *(p. 60)*. The DEIR is currently being prepared for this project.

Turning Basin Drive
It is not clear to me whether this is a vehicular street or a pedestrian/bike street. It wouldn't be appropriate as a vehicular street, as this would create a barrier between the inland areas and the waterfront.

The Roundabout(s)
Policy 2.3 *(Establish a roundabout on East Washington Street)* proposes a traffic circle with a 150' radius at East Washington and Copeland. I do not agree with the policy statement that this is an appropriate gateway element to the city.

- ***One***, a traffic circle creates a void in the landscape; it is a large, open paved area and as such is not particularly inviting or attractive.
- ***Two***, this is a very important future pedestrian area, as noted in the plan, because the future rail and bus transit hubs are to be located here. A large traffic circle will actually be more difficult for pedestrians to traverse.
- ***Three***, this juncture will be an important link between east and west Petaluma, once infill development has created a more urban environment along this stretch of East Washington. It is important to link the two developed portions of Petaluma, not create a break in the development pattern.
- ***Four***, traffic circles are most effective when directing traffic from several directions through an area. This area has mainly east-west traffic and will not perform a particularly valuable function.
- ***Five***, I have concerns that creating a traffic circle that will be heavily used by buses will decrease sight-lines within the circle. When integrating a bus transit center within existing street patterns, it is actually optimal to give transit advantages through signalization and channelization; not direct them through traffic circles with vehicular traffic.

11

- *Six*, I think that East Washington and Lakeville is a more important gateway to the city, as it is the juncture of two entrances from the freeway system and the future site of the rail transit center.

Narrowing of Petaluma Blvd and Lakeville Street

The roadway system in Petaluma is constrained by the River in both the north-south and east-west directions. The major arterials of "D" Street, Washington, Petaluma Blvd. and Lakeville carry much of the through-traffic in the city, as noted in the plan. Because of the lack of other options for through-traffic, I feel it is inappropriate to reduce the capacity of Petaluma Blvd. N. and Lakeville Streets. Traffic is 'calmed' in downtown Petaluma by cars that park parallel to the curb and back into the outside lane of traffic. This is very effective in slowing traffic. To create a situation north and south of town where cars are backing into the *only* lane of traffic would increase congestion to the degree, I believe, that access to downtown would be affected, thereby impacting businesses.

As more pedestrian oriented businesses develop north and south of town along Petaluma Blvd. N. and S., traffic can be increasingly 'calmed' by adding neck-downs and pedestrian activated signals, similar to the one in the center of town. It is not necessary or desirable to reduce the capacity of the existing arterial network. It would, however, be beneficial to explore options for on-street parking along all arterial streets, if this can be accommodated within the existing right-of-way without sacrificing lane capacity.

Diana Painter, PhD, AICP
2685 A Petaluma Blvd. N.
Petaluma, CA 94952

11. Letter from Diane Painter; Architectural Research, Preservation Planning, Urban Design; 2688A Petaluma Boulevard North, Petaluma

Comment 11.01: Resources do not have to be formally identified to be considered under CEQA (section 21084.1 of Calif. Public Resources Code, Historic Resource Guidelines).

> Response: Comment acknowledged. The last paragraph on page 7-8 of the February 27, 2003 Draft EIR did include reference to the fact that, under the CEQA Guidelines, a historic resource shall be presumed to be historically or culturally significant if it is a resource that is included in a local register of historic resources, or identified as significant in a historical resources survey, or "deemed to be eligible for listing in the California Register of Historic Resources or the National Register of Historic Places." In response to this and related comments, other revisions have been added to the Draft EIR text to reiterate this point--i.e., that a "historic resource" as defined under CEQA can include a resource "determined to be eligible for listing in the California Register of Historic Resources" and "an object, building, structure, site, or place which the City determines to be historically significant, supported by substantial evidence." Please see these revisions to Draft EIR pages 7-2 and 7-7 in section 3 herein (Revisions to the Draft EIR).

Comment 11.02: Windshield survey does not meet Public Resources Code standards (standard #3 under section 21084.1 of the California Public Resources Code, Historic Resource Guidelines).

> Response: Comment acknowledged. Please see responses herein to similar comments PC.13 and PC.29.

Comment 11.03: No documentation that substantiates 66 potential historic resources identified in plan area. Evaluation criteria required by law not fully considered. Citation of study may be misleading to the public by implying that full consideration of each potential resource and its significance was made.

> Response: Comment acknowledged. Please see responses to comments PC.13, PC.29, and SP.02.

Comment 11.04: Mitigation has been established without knowing the full extent of the value of the historic resources.

> Response: The mitigation language under Mitigation 7-2 is intended to acknowledge and address the fact that additional historic resource evaluation will be necessary for future project-specific actions that will demolish or otherwise "materially impair" a CEQA-defined historic resource. Please see the revisions to the language under Mitigation 7-2 in response to this and similar comments.

Comment 11.05: Completion of Historic Resources Survey meeting City and State guidelines is recommended; will give more guidance to developers; otherwise, future development activities involving historic resources could be challenged on a project-by-project basis.

> Response: Comment acknowledged. The City may eventually elect to prepare and adopt a "local register of historic resources," as defined in Public Resources Code section 5020.1(k), and/or complete a "historic resources survey" meeting the requirements of Public Resources Code section 5024.1(g). However, neither of these steps is a mandated EIR component or a mandated part of the EIR preparation procedure under CEQA.

Comment 11.06: 25 percent cap on project area buildout projection results in low projection for listed reasons; Plan and EIR should demonstrate in more detail why impact analysis based on 25 percent buildout cap is considered adequate.

> Response: Please see responses to similar comments 4.01 and 3.03.

Comment 11.07: Historic resources that have not been formally determined to be a historic resource are not precluded from review under CEQA.

> Response: Comment acknowledged. Please see response to similar comment 11.01.

Comments on the DEIR for the Central Petaluma Specific Plan. Page 1
Christopher Stevick, 28 Liberty St Petaluma, California

Whereas: The Draft E.I.R. is vague about describing any specific resources, specifically historic resources. Historic resources were not appropriately evaluated. Therefore any potential impact to resources as a result of this plan is unknown at this time so mitigation cannot be established. 12.01

Whereas: The warehouse district buildings and railroad tracks by themselves alone may not qualify as a historic resource individually, they certainly contribute as a part of a significant historical resource or a potential district. 12.02

Whereas: Petaluma owes its prosperity to commerce and Petaluma's unique position at the top of the Petaluma River. It was the Petaluma Trolley, which brought supplies to the fertile valleys to the North and transported produce and products south which San Francisco needed. Because of the Trolley, Petaluma's commerce successfully competed with the railroad, which had passed us by in favor of the Larkspur Ferry. This fact makes the warehouse district buildings and tracks specifically significant to Petaluma's history.

Whereas: The D.E.I.R. and the subsequent F.E.I.R. in many ways makes development exempt from S.E.Q.A., which is California's protection against the unmitigated demolition of historic resources. We are very concerned that this plan will allow the unchallenged demolition of historic resources. 12.03

Whereas: The ultimate results of the implementation of the Specific Plan are unclear to everyone involved with the exception with the exception that it will fast track a massive amount of development in our historic areas. 12.04

Whereas: Once a historic resource or potential historic resource is gone it is gone forever and will irrevocably change the architectural complexion of Petaluma.

Whereas: The D.E.I.R. projects a low 25% buildout in order to evaluate impacts, which would result in many traffic problems that have no realistic solutions, but no additional impact scenarios were evaluated, even though it is quite probable that more infill development will occur. 12.05

Whereas: There may be no deterring penalty in place for the destruction of a potential historic resource or penalties/consequences for the demolition of a contributor to a potential historic resource. This is not made clear in the DIER. 12.06

Whereas: We have recently lost two very historic buildings to fire within one block of each other just prior to potential and presently scheduled development.

Whereas: In just this last year, development near Petaluma's historic downtown both approved and proposed already exceeds the total development that has occurred in the last 50 years.

Whereas: It is much easier to loosen zoning code restrictions such as building height limits than it is to tighten them. Once a zone has been established, it is legally and economically difficult to down zone. Negotiations for variances to existing codes, such as height limits, this can result in greater impacts to a neighborhood then envisioned in the original plan.

12

Whereas: The argument that "We should not worry about 6-story high buildings zones because they will not result in 6-story buildings" tells me that, there is therefore, no need to zone for them.

I therefore recommended that:

1) S.P.A.R.C. retain its current preview status and not be limited as the admitted mistake in the final 2003 Specific Plan draft is written in Section 1 – Code Applicability, 1.10.010 – applicability of Code Standards, H.

" H. Design Review. All buildings and associated site improvements within this Specific Plan are subject to design review for material selection and building façade design by S.P.A.R.C.

2) It is very important that SPARC retain the ability to evaluate the site design, respond to context, and overall architectural design quality of project proposals in the City of Petaluma.

3) The lower building height through the plan area is recommended.

4) The tracks be regarded as a special cultural and historic resource and that the Trolley Proposal be given every advantage to be realized. All proposed projects that affect the track line must be evaluated to insure that they protect this resource.

12.07

Christopher Stevick
Pres. Heritage Homes

12. Comments on Draft EIR from Christopher Stevick, President, Heritage Homes, 28 Liberty Street, Petaluma; April 21, 2003

Comment 12.01: Draft EIR is vague about describing specific historic resources not appropriately evaluated. Impacts of Specific Plan on historic resources therefore unknown. Mitigation cannot be established.

Response: Please see response to similar comment 11.04.

Comment 12.02: Warehouse district buildings and railroad tracks contribute as part of historic resource or district; warehouse district buildings and tracks specifically significant to Petaluma's history.

Response: Comment acknowledged. Specific Plan chapter 9 (Historic Preservation; Historic Resources Survey and National Register Status Codes) and the EIR historic resources discussions on pages 7-3 and 7-7 include adequate recognition of these historic values (the reference to 66 identified potentially significant resources on page 7-7 inherently includes warehouse district buildings and railroad tracks).

Comment 12.03: Draft EIR in may ways makes development exempt from CEQA, the state's protection against unmitigated demolition of historic resources.

Response: Please see responses to similar comments PC.15, SP.02, 10.02, 10.03, and 10.05.

Comment 12.04: Specific Plan will fast track massive amount of development in City's historic areas.

Response: Please see responses to similar comments 10.02, 10.03, 10.05, PC.15, and SP.02.

Comment 12.05: Draft EIR only looks at 25 percent buildout cap scenario; no additional (higher cap) scenarios were evaluated.

Response: Please see responses to similar comments 4.01 and 3.03.

Comment 12.06: Draft EIR does not make clear that there may be no deterring penalty in place for destruction of potential historic resource or for demolition of a contributor to a potential historic resource.

Response: Please see responses to similar comments PC.15, SP.02, 10.02, 10.03, and 10.05.

Comment 12.07: The tracks should be regarded as a special cultural and historic resource; all proposed projects that affect the track line must be evaluated to insure that they protect this resource.

Response: Comment acknowledged. Please see responses to similar comments 10.05, SP.02, PC.15, 10.02, and 10.03.

13

City of Petaluma Council Meeting
April 21, 2003

Good Evening Mayor Glass and Council Members

My name is Katherine Rinehart and I live at 118 English Street, Petaluma.

I'm here tonight to comment on the Draft EIR for the CPSP – specifically how it addresses historic resources.

I've presented comments and in some instances provided recommendations on the Plan itself to the Planning Commission. I've also made comments on the Draft EIR and presented them publicly to the Planning Commission on March 25th.

It is my understanding that these comments and recommendations were passed onto you as the Planning Commission expressed their agreement with many of my recommendations on how the Plan and its accompanying SMART Code might be improved as they relate to historic resources.

I realize that you must have numerous comments on both the Draft EIR and the Plan before you related to many different aspects of concern which must be reviewed before you can vote on whether or not to approve the Plan and certify the EIR.

What I'm asking tonight is that you pay particular attention to how the EIR deals with historic resources – known and unknown located within the CPSP project area. 13.01

I've spent a lot of time reviewing this document – the EIR as well as the Plan itself. As my comments to the Planning Commission state I've noticed several inconsistencies between the EIR and the Plan and some incorrect information.

I'd like to point out that despite all the language in both the Plan and the EIR about the importance of the historic character and resources that exist within the Plan area and how that is to be maintained there are no incentives or guarantees provided that will assure that historic resources are preserved and/or adaptively re-used. 13.02

In fact, the more I read the EIR the more I fear that the exact opposite will occur, that demolition of historic buildings whether formally recognized or not will take place without any significant review.

It is my understanding that one of the main purposes of the Plan and EIR is to streamline the application process. As it appears now, streamlining will be achieved at the cost of destroying many of the resources that define Petaluma's unique and historic character.

The Plan attempts to identify historic resources; however, it was done by a windshield survey that is inadequate. 13.03

13

The EIR relies on that survey to make its findings. The EIR also states that it relied on a historic resources report (see page 7-2) that doesn't exist. The EIR states that there are 66 potentially significant historic resources located within the Plan area but isn't very specific as to what those 66 resources are and it gives the impression that no other potentially significant resources exist within the CPSP project area. 13.04

The whole way in which historic resources are dealt with in both the Plan and the EIR is confusing.

I've spoken with Planning Commissioners, members of SPARC and of the general public and despite efforts made by Planning staff to provide clarification a lot of questions still exist.

I realize how much work has gone into the Plan and I applaud all those who have been involved. I too see this Plan as the start of some terrific things for Petaluma.

However, please note that it is my understanding that if you certify the EIR as it is currently written by adopting a Statement of Overriding Consideration you will be authorizing the demolition of any building without conducting further study and evaluation that is recommended in the Plan itself or ever exploring whether or not adaptive re-use might be considered as an alternative. 13.05

Here is what I propose:

Take extra time reviewing the historic resources sections of the EIR and the Plan, take my comments and recommendations that were given to the Planning Commission into consideration and 13.06

Revise language in the EIR so that when a demolition of a potentially significant historic resource is proposed (and this would be above and beyond the 66 referred to in the EIR), that additional study/evaluation be required. 13.07

This seems absolutely necessary given that the study conducted to identify potentially significant historic resources was only a windshield survey which Planning staff has stated couldn't possibly have take into consideration all the potentially significant resources located within a 400 acre project area.

I'll conclude by saying that the protection of historic resources need not be a limitation on development; rather it can be the basis for it.

We are a town that prides itself on its unique historic character. I'm here tonight in hopes that this historic character can be preserved for future generations.

Thank you.

Katherine J. Rinehart, MA

13. Presentation by Katherine J. Rinehart, MA, to Petaluma City Council, Petaluma City Council Meeting of April 21, 2003

Comment 13.01: City Council should pay particular attention to how EIR deals with historic resources, known and unknown, within Specific Plan area.

> Response: Comment acknowledged. Chapter 7 of the Draft EIR (Cultural and Historic Resources), including setting, impact and mitigation statements regarding historic resources, have been refined and clarified in response to comments submitted by Ms. Rinehart and others. Please see responses to more detailed comments below.

Comment 13.02: No incentives or guarantees provided in Draft EIR that will ensure that historic resources are preserved and/or adaptively re-used; rather, the exact opposite could occur--demolition of historic buildings, whether formally recognized or not, may occur under this EIR without any significant review. EIR seeks to streamline the application process; as currently written, streamlining may be achieved at the cost of destroying many of the resources that define Petaluma's unique and historic character.

> Response: Please see responses to similar comments 10.02, 10.03, SP.02, and PC.15.

Comment 13.03: Windshield survey inadequate for identification of historic resources.

> Response: Please see responses to similar comments PC.13, PC.14, PC.29, and 11.02.

Comment 13.04: Draft EIR-cited historic resources report (page 7-2) does not exist. Mention of 66 potentially significant resources implies that no other potentially significant resources exists within the Specific Plan area.

> Response: Please see responses to similar comments PC.29, PC.13, and PC.18.

Comment 13.05: Certification of EIR as currently written and adoption of associated Statement of Overriding Considerations will authorize demolition of any building without further study and evaluation or even exploring whether or not adaptive re-use might be considered as an alternative.

> Response: Please see response to similar comment 10.02.

Comment 13.06: Commenter's comments and recommendations submitted to Planning Commission should be taken into consideration.

> Response: Comment acknowledged. Commenter's comments to the Planning Commission and associated responses are included herein under codes PC.07 through PC.30.

Comment 13.07: Revise EIR language so that when a demolition of a potentially significant historic resource is proposed (above and beyond the 66 potential resources referenced in the Draft EIR), additional study/evaluation will be required. Absolutely necessary given that study conducted to identify potentially significant historic resources was only windshield survey.

> Response: In response to this and similar comments, the language on Draft EIR pages 7-7 and 7-8 has been revised to clarify that additional study (preparation of a project-specific CEQA documentation, including identification and evaluation of alternatives) will be required for any future Specific Plan-facilitated development action that involves demolition of a CEQA-defined historic resource; or involves effects that will "materially impair" the significance of a historic resource.

14

SONOMA COUNTY WATER AGENCY

FILE:ECS/SCH NUMBER 2002-112-039/
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE CENTRAL PETALUMA SPECIFIC PLAN
FILE:2N/2-0-1

April 21, 2003

Mr. Mike Moore
Community Development Director
City of Petaluma
11 English Street
Petaluma, CA 94952

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CENTRAL PETALUMA SPECIFIC PLAN (SCH NUMBER 2002-112-039)

Dear Mr. Moore:

The Sonoma County Water Agency (Agency) has reviewed the City's Draft Environmental Impact Report (DEIR) for the Central Petaluma Specific Plan. In response, the Agency submits the following comments.

Section 8.2 Water.

8.2.1 Setting

The Agency extracts water from the alluvial aquifer of the Russian River from five collector wells adjacent to the Russian River and then provides chlorination and pH adjustment prior to the water entering the Agency Aqueduct. Sentence 4 in paragraph 1 should be edited, as written, it could be misinterpreted to suggest that the Agency draws water directly from the Russian River. In addition, the language regarding current demands is incorrect. Current demand on the Agency does not exceed its water rights. Current peak summer demands can, however, exceed the Agency's physical ability to deliver water. This temporary impairment will be addressed with the completion of Collector No. 6, now currently under construction. 14.01

In paragraph three of section 8.2.1, the DEIR states that the EIR for the Agency's Water Supply and Transmission System Project (WSTSP) was upheld in court in 2000. Although the WSTSP EIR was upheld at the trial court level, that decision was appealed, and the appeal is pending. The WSTSP EIR is thus still the subject of litigation.

Also within paragraph three of section 8.2.1, please replace the term "signatories," with SCWA contractors.

P.O. Box 11628 - Santa Rosa, CA 95406 - 2150 W. College Avenue - Santa Rosa, CA 95401 - (707) 526-5370 - Fax (707) 544-6123

14

14.02

8.2.3 Impacts and Mitigation Measures
As indicated above, please incorporate the above corrections in reference to the WSTSP litigation. In addition, in paragraph 4 of section 8.2.3, please indicate that the City of Petaluma is the water supplier and not the water district in question. The Agency provides the amount of water allocated for each of its contractors and does not determine individual cities or project water needs. The City of Petaluma would be the governing entity i.e. "water supplier" to determine the adequacy of the water supplies for the above-mentioned project.

Thank you for the opportunity to comment. For additional questions or comments, I can be reached at 547-1998 or emailed at bautista@scwa.ca.gov.

Sincerely,

Marc Bautista
Environmental Specialist

c Ken Goddard

rs3/u/cl/rw/erpad/bautista/centrl_specif-plan

14. Letter from Marc Bautista, Environmental Specialist, Sonoma County Water Agency; April 21, 2003

Comment 14.01: Revisions to Draft EIR section 8.2.1 (water setting) requested.

Revisions to Draft EIR section 8.2.3 (water impacts and mitigations) requested.

> Response: Comments acknowledged. The requested revisions have been made to the Draft EIR pages 8-4, 8-5, 8-6, and 8-7.

3. REVISIONS TO THE DRAFT EIR

The following section includes all revisions to the Draft EIR made in response to comments received during the Draft EIR public review period. All text revisions are indicated by an "r" in the left margin next to the revised line. All of the revised pages supersede the corresponding pages in the March 2003 Draft EIR. None of these revisions to the Draft EIR involves a substantial increase in the severity of an identified significant impact or the identification of a significant new impact, mitigation, or alternative considerably different from those already considered in preparing the March 2003 Draft EIR.

The bikeway network has not been developed as a viable commute alternative in Petaluma or within the Specific Plan area. According to the 2000 Census, just 1.1 percent of Petaluma residents commute to work by bicycle (up from 0.9 percent in 1990). East-west connections are lacking, and the major roadways providing east-west access, such as Washington Street, do not include bicycle lanes. Just a short segment of Lakeville Street near the Petaluma Depot is striped with bicycle lanes.

b. Pedestrian Circulation. The City has established policies to encourage improvement of the pedestrian network, and Petaluma has many areas that seem especially conducive to walking for enjoyment and as a form of transportation, particularly within the Downtown area and West Side neighborhoods that include a grid of streets with a well-developed sidewalk network.

A pedestrian bridge across the Petaluma river links downtown with the Golden Eagle Shopping Center. The river is also accessible along the Turning Basin docks from the Golden Eagle Center to Cavanaugh Landing and the River House restaurant. However, the pedestrian connections between Downtown, the river, and adjacent neighborhoods within the Specific Plan area are not particularly well developed in most cases. Much of the Specific Plan area is not pedestrian friendly, particularly East Washington and Lakeville streets, which are wide streets that carry fast-moving traffic. The adjacent street grid does not fully extend to the river in many places, and is broken up by the railroad tracks on the east side.

6.1.8 Public Transit

Public transit does not play a major role in Petaluma's transportation network. Relatively low-density land use patterns and long intervals between buses have limited the ability of public transit to compete with the efficiency and convenience of the private automobile.

According to the 2000 Census, five percent of Petaluma's residents commute to work by transit, up from 4.2 percent in 1990. Bus service providers within the Specific Plan area include Petaluma Transit, Sonoma County Transit, and Golden Gate Transit. A brief description of each provider is provided below. Figure 6.2 illustrates the major transit routes serving Petaluma.

r a. Petaluma Transit. Petaluma Transit provides service within the City limits. Buses operate
r on 60-minute intervals during weekdays. Petaluma Transit provides five buses on three fixed-
r routes that connect the Lakeville Business Park/North McDowell Extension business area and
r the west side of town to Washington Square, Petaluma Plaza, the library, and the downtown. Petaluma Transit focuses service along the Washington Street corridor, bounded by the downtown on the west end and Petaluma Plaza/Washington Square shopping centers on the east end.

b. Sonoma County Transit. Sonoma County Transit provides connections to Santa Rosa, Sonoma, Rohnert Park and other destinations within Sonoma County. Sonoma County Transit provides three routes (Routes 40, 44, and 48) within Petaluma. Route 40 connects Petaluma and Sonoma using D Street, Lakeville Highway, and Frates Road. Bus intervals are generally every 90 minutes on weekdays only. Both Routes 44 and 48 provide bus service between Petaluma and Santa Rosa. Route 44 provides service along Washington Street and McDowell Boulevard and Route 48 provides service along Petaluma Boulevard and Old Redwood Highway. Bus intervals vary from 50 minutes to two hours, depending on the time of day. These routes operate on weekdays, with limited hours on weekends.

c. Golden Gate Transit. Golden Gate Transit provides southbound service to Marin County and San Francisco during the morning peak hours and northbound service during the evening peak hours. Golden Gate Transit operates primarily as a commuter service along the U.S. Highway 101 corridor. During peak hours of operation, typical intervals between buses are five to 10 minutes. Little or no service is provided outside of the peak hours in the peak direction. The three main routes are:

- Route 76, which provides service from Rohnert Park and the East Side of Petaluma to San Francisco via Ely Road, Sonoma Mountain Parkway and McDowell Boulevard;
- Route 74, which provides service from Santa Rosa and Petaluma to San Francisco via Petaluma Boulevard and the Downtown bus depot; and
- Route 80.

6.2 PERTINENT PLANS AND POLICIES

City and regional plans and policies in place that affect transportation in Petaluma and are relevant to consideration of the environmental impacts of the proposed project are described below.

6.2.1 Petaluma General Plan, 1987-2005

The Petaluma General Plan *Transportation Element* (adopted in 1987) contains objectives and policies aimed at improving circulation for motor vehicles, transit, pedestrians and bicycles within the City. A key goal of the General Plan is to "*reduce dependence on the automobile by integrating, to the extent feasible, alternative transportation modes as a fundamental component of the City's transportation system*".

A key emphasis of the 1987 General Plan was improving east-west connections across the Petaluma river and U.S. 101. Specific recommendations include widening of Corona Road and improvements to Washington Street. The General Plan also includes recommendations for two new East-West connections that have not yet been implemented: (1) the proposed "Rainier Overcrossing and Interchange" north of the Central Petaluma Specific Plan area which would cross the Petaluma River and connect Petaluma Boulevard and U.S. 101; and (2) the

designations envisioned by the 1987 Petaluma General Plan would be retained and the following transportation improvements would be developed:

- Widening Corona Road to five lanes (four through lanes and a left-turn lane/median) from Petaluma Boulevard to North McDowell Boulevard.

- Widening Washington Street between North McDowell Boulevard the U.S. 101 interchange ramps to accommodate special channelization for turn lanes necessitated by the increasingly heavy turn volumes at the intersections;

- Building a four-lane divided arterial along Rainier Avenue from North McDowell Boulevard to Petaluma Boulevard North with an overcrossing and interchange with U.S. 101; and

- Providing a southern crossing of the Petaluma River to connect Petaluma Boulevard South, from below the U.S. 101 bridge over the Petaluma River, to Lakeville Street near Caulfield Lane.

r Note: Under Cumulative No Project conditions, the lane configurations at each end of the
r southern crossing and the new road (eastbound approach) at the Lakeville Street/U.S. 101
r Southbound Ramps intersection were assumed. The proposed lane configurations at each
r intersection are described below.
r
r Petaluma Boulevard/Mountain View Avenue:
r
r *Northbound and Southbound Approaches (Petaluma Boulevard)* – maintain two through lanes
r and provide exclusive left- and right-turn lanes; and
r
r *Eastbound and Westbound Approaches (Mountain View Avenue)* – provide an exclusive left-
r turn lane and shared through/right-turn lane.
r
r Lakeville Street/Caulfield Lane:
r
r *Eastbound Approach (Caulfield Lane extension)* – maintain one through lane and exclusive
r left- and right-turn lanes;
r
r *Westbound Approach (Caulfield Lane)* – maintain exclusive left-turn lane and shared
r through/left-turn lane, and provide dual right-turn lanes; and
r
r *Northbound and Southbound Approaches (Lakeville Street)* – provide one through lane and
r exclusive left- and right-turn lanes.
r
r Lakeville Street/U.S. 101 Southbound Ramps:
r
r *Eastbound Approach (new road)* – provide one through and exclusive left- and right-turn lanes;
r all other approaches maintain existing lane configurations.

Cumulative Plus Project Scenario 1 assumes none of the General Plan transportation improvements listed above would occur, including the southern crossing. Land use and transportation changes envisioned by the Specific Plan would be adopted, including the following assumptions:

- "Road Diets" (i.e., lane reduction from four to two lanes with the addition of bike lanes) would be carried out on Lakeville Street and Petaluma Boulevard to calm traffic and enhance travel conditions for pedestrians and bicyclists; and

- New local streets and roadway improvements, including extension of the City's street grid on both the north and south side of the Petaluma River, would be made.

These improvements are diagrammatically illustrated in Figure 6.3.

r Note: Under Cumulative Plus Project Scenario 1 conditions, the lane configurations at each
r end of the southern crossing and the new road (eastbound approach) at the Lakeville Street/
r U.S. 101 Southbound Ramps intersection were assumed. The proposed lane configurations at
r each intersection are described below.
r
r Petaluma Boulevard/Mountain View Avenue:
r
r *Northbound and Southbound Approaches (Petaluma Boulevard)* – maintain shared
r through/right-turn lane and provide exclusive left-turn lanes; and
r
r *Eastbound and Westbound Approaches (Mountain View Avenue)* – provide a shared
r left/through/right-turn lane.
r
r Lakeville Street/Caulfield Lane:
r
r *Eastbound Approach (Caulfield Lane extension)* – provide one through lane, an exclusive left-
r turn lane, and dual right-turn lanes;
r
r *Westbound Approach (Caulfield Lane)* – same lane configurations as described for Cumulative
r No Project conditions; and
r
r *Northbound and Southbound Approaches (Lakeville Street)* – provide one through lane, an
r exclusive left-turn lane, and dual right-turn lanes.
r
r Lakeville Street/U.S. 101 Southbound Ramps:
r
r Same lane configurations as described for Cumulative No Project conditions.
r

Cumulative Plus Project Scenario 2 assumes the same land use changes envisioned by the Specific Plan as outlined for Scenario 1, above, with the following changes:

- the southern crossing would not be built; and
- the "Road Diets" (on Lakeville Street and Petaluma Blvd.) would not occur.

These improvements are diagrammatically illustrated in Figure 6.4.

Note: Under Cumulative Plus Project Scenario 2 conditions, the lane configurations at each end of the southern crossing and the new road (eastbound approach) at the Lakeville Street/ U.S. 101 Southbound Ramps intersection were assumed. The proposed lane configurations at each intersection are described below.

Petaluma Boulevard/Mountain View Avenue:

Same lane configurations as described for Cumulative No Project conditions.

Lakeville Street/Caulfield Lane

Eastbound Approach (Caulfield Lane extension) – same lane configurations as described for Cumulative Plus Project Scenario 1 conditions; all other approaches will have the same lane configurations as described for Cumulative No Project conditions.

Lakeville Street/U.S. 101 Southbound Ramps:

Same lane configurations as described for Cumulative No Project conditions.

Cumulative Plus Project Scenario 1 & Scenario 2. The residential land use component of the proposed Specific Plan includes approximately 1,617 housing units. The commercial component of the proposed Specific Plan includes approximately 2,993,000 square feet of commercial space. In total, the proposed Specific Plan is therefore expected to generate approximately 115,000 net new daily trips and approximately 11,120 net new PM peak-hour trips. Since these figures do not include internalization of trips resulting from complimentary, dense land uses, and other trip reductions, the TransCAD model traffic projections are comparable to the estimates derived using ITE trip rates.

(b) Projected Trip Distribution and Trip Assignment. In TransCAD, the trip assignment process determines the route that each vehicle-trip follows to travel from origin to destination. The model selects these routes in a manner that is sensitive to congestion and the desire to minimize overall travel time. TransCAD uses an iterative, capacity-restrained assignment and equilibrium volume adjustments. This technique finds a travel path for each trip that minimizes the travel time, with recognition of the congestion caused by other trips.

(c) Intersection Assessment – Future Conditions. The TransCAD model yields daily and PM peak hour traffic forecasts for local roadways. Based on these data, intersection turning movements were derived through a factoring process that uses existing turning movement volumes, projected approach and turning movement volumes and balances intersection approach and departure volumes. AM peak hour forecasts were derived by applying the current ratio or AM to PM peak hour traffic volumes to the projected PM peak hour roadway volumes.

Table 6.6 compares the PM peak hour existing levels of service for each study intersection to the resulting levels of service under Cumulative No Project and Cumulative Plus Project conditions. (Detailed traffic volumes, turning movements and lane configurations for the Cumulative No Project and the two With-Project scenarios are shown in Figures 8, 9, and 10 in Appendix 21.5.) As shown in Table 6.6, the eight study intersections currently operating at LOS D or worse will continue to operate unacceptably under Cumulative No Project conditions. However, at three intersections that currently operate at LOS E or F (Petaluma Boulevard/ Lakeville Street, D Street/Lakeville Street, and Petaluma Boulevard/D Street), transportation improvements envisioned by the 1987 General Plan would improve traffic operations to LOS D under Cumulative No Project conditions during the PM peak hour. These improvements, which include the construction of the Southern Crossing (Caulfield Extension), Rainier Interchange, and the widening of U.S. 101 from four to six lanes, are expected to alleviate the
r congestion that currently exists at these study intersections. As indicated in Table 6.6, three
r study intersections currently operating acceptably but expected to fail (LOS D or worse) under
r Cumulative No Project conditions include: U.S. 101 Northbound Ramps/Redwood Highway,
r Lakeville Street/Lindberg Lane, Lakeville Street/Caulfield Lane, and Lakeville Street/U.S. 101
r Southbound Ramps. Table 6.6 also indicates that the proposed construction of the Southern
r Crossing would cause operations at the Caulfield Lane/Lakeville Street intersection to
r deteriorate from LOS C to LOS F under all cumulative scenarios.

Table 6.6 indicates that, under Cumulative Plus Project Scenario 1, the eight study intersections currently operating at LOS D or worse would continue to operate unacceptably. However, at one intersection that currently operates at LOS E (Petaluma Boulevard/D Street),

Table 6.6
PM PEAK PERIOD INTERSECTION LEVELS OF SERVICE (LOS) – CUMULATIVE NO PROJECT AND PLUS PROJECT

No.	Intersection	Levels of Service			
		Existing Conditions	Cumulative No Project (General Plan)	Cumulative Plus Project (Scenario 1)	Cumulative Plus Project (Scenario 2)
1	U.S.101 NB Ramps / Redwood Hwy	C	**D**	**E**	**E**
2	U.S.101 SB Ramps / Redwood Hwy	C	C	**D**	**D**
3	McDowell Blvd / Madison St	B	C	C	C
4	U.S. 101 NB Ramps / East Washington St	**D**	C	**D**	C
5	U.S. 101 SB Ramps / East Washington St	C	C	**E**	**D**
6	Lakeville St / Lindberg Ln	C	**D**	C	C
7	Lakeville St / Caulfield Ln	C	~~**D**~~ **E**	**F**	**F**
8	Lakeville St / U.S. 101 SB Ramps	B	**D**	C	**D**
9	Lakeville St / U.S. 101 NB Ramps	B	C	C	C
10	Lakeville Hwy (SR 116) / Baywood Dr	**D**	**F**	**F**	**F**
11	Petaluma Blvd / Lakeville St	**F**	D	**F**	**D**
12	East Washington St / Lakeville St	C	C	**D**	**D**
13	D St / Lakeville St	**E**	D	**F**	**F**
14	Copeland St / East Washington St[1]	**F**	**F**	**F**	**F**
15	Petaluma Blvd / East Washington St	**D**	D	**E**	**D**
16	East Washington St / Kentucky St	B	B	B	B
17	East Washington St / Liberty St	**F**	**F**	**F**	**F**
18	East Washington St / Bodega Ave / Howard St	C	C	C	C
19	Western Ave / Kentucky St	A	A	B	A
20	Petaluma Ave / Western Ave	B	B	B	B
21	Petaluma Blvd / B St	A	A	A	A
22	Petaluma Blvd / D St	**E**	**D**	**D**	**E**
23	Petaluma Blvd / I St	B	B	**F**	B
24	Petaluma Blvd / Mountain View Ave	B	~~**B**~~ C	B	~~**D**~~ C
25	Petaluma Blvd / McNear Ave	A	A	B	A

Source: Fehr & Peers Associates, Inc.
Notes: Bold font indicates LOS D or worse.
[1] For unsignalized intersections, level of service reported is for approach with highest delay.

r operations would improve to LOS D. In addition to project traffic, the roadway changes
r proposed under Cumulative Plus Project Scenario 1, particularly the planned "road diets" on
r Lakeville Street and Petaluma Boulevard, would cause the following changes in traffic
r operations:
r
r - All study intersections along Lakeville Street, except at Lindberg Lane and the U.S. 101
r Ramps, would deteriorate at least one service level from existing conditions; and
r - Level of service at the Petaluma Boulevard/I Street intersection would deteriorate from
r LOS B to LOS F.
r

Six additional intersections would operate at LOS D or worse under Cumulative Plus Project Scenario 1.

For Cumulative Plus Project Scenario 2, Table 6.6 indicates that the eight study intersections currently operating at LOS D or worse would continue to operate unacceptably, with the exception of the following intersection: U.S. 101 northbound ramps/East Washington Street, which would operate at LOS C. In addition, the Petaluma Boulevard/Lakeville Street and Lakeville Street/Lindberg Lane intersection would improve from LOS F to LOS D operations. Six additional intersections would operate at LOS D or worse under Cumulative Plus Project Scenario 2.

Table 6.7 compares the existing and cumulative levels of service for key State facilities and interchanges within the study area during the AM peak hour. (Detailed traffic volumes, turning movements and lane configurations for the Cumulative No Project and the two With-Project
r scenarios are shown in Figures 11, 12 and 13 in Appendix 21.5.) As shown, four of the seven
r study intersections that currently operate at LOS C or better will maintain current operations
r under Cumulative No Project and Cumulative Plus Project conditions: East Washington
r Street/U.S. 101 Northbound Ramps, E. Washington Street/Lakeville Street, Lakeville
r Street/Lindberg Lane, and Lakeville Street/U.S. 101 Northbound Ramps. Likewise, certain other study intersections currently operating unacceptably at LOS D or worse will continue to operate unacceptably under the Cumulative No Project and Cumulative Plus Project scenarios,
r as shown in Table 6.7.

(d) Freeway Segments – Future Conditions. Table 6.8 presents the peak hour traffic for both directions and resulting levels of service at five segments along the U.S. 101 corridor under Cumulative No Project and Cumulative Plus Project conditions. This analysis assumes that U.S. 101 would be widened from four to six lanes (with an HOV lane) and the Rainier Avenue Interchange would be in-place. As shown, the level of service on each segment of U.S. 101 would improve one-level higher from its current level under Cumulative No Project conditions during the peak hour. However, the construction of the Rainier Avenue Interchange would potentially increase the volume on the segment of U.S. 101 between the Washington Street and Redwood Highway Interchanges (within the study area), therefore resulting in traffic

operations to deteriorate from LOS D to E. With the addition of project traffic, the levels of service on all segments of U.S. 101 are expected to deteriorate one service level under Cumulative Plus Project (both scenarios) conditions. In addition, project traffic would substantially increase the volume along the segment of U.S. 101 between the Washington Street and Rainier Avenue Interchanges, causing the volume on this particular segment to exceed its capacity and resulting in LOS F. In general, the proposed project is expected to generate a substantial amount of project trips which would increase local and regional traffic, particularly within the Central Petaluma Specific Plan area. However, these forecasts are conservative since they do not take into account the potential benefits of the proposed regional transit system and underestimates the potential for internalization of trips due to the mix of land uses within the Specific Plan area.

(e) Motor Vehicle Traffic and Parking -- Impacts and Mitigations. The following impacts to traffic have been identified:

Table 6.7
AM PEAK PERIOD STATE FACILITIES INTERSECTIONS AND INTERCHANGES LEVELS OF SERVICE (LOS) – CUMULATIVE NO PROJECT AND PLUS PROJECT

No.	Intersection	Levels of Service			
		Existing Conditions	Cumulative No Project	Cumulative Plus Project (Scenario 1)	Cumulative Plus Project (Scenario 2)
1	U.S.101 NB Ramps / Redwood Hwy	C	**E**	**F**	**F**
2	U.S.101 SB Ramps / Redwood Hwy	C	**D**	**E**	**E**
4	U.S. 101 NB Ramps / East Washington St	C	B	C	B
5	U.S. 101 SB Ramps / East Washington St	**D**	**E**	**F**	**F**
6	Lakeville St / Lindberg Ln[1]	C	C	B	B
7	Lakeville St / Caulfield Ln[1]	**D**	**F**	**F**	~~E~~ **F**
8	Lakeville St / U.S. 101 SB Ramps	C	**D**	~~E~~ **D**	~~E~~ **D**
9	Lakeville St / U.S. 101 NB Ramps	B	C	C	C
10	Lakeville Hwy (SR 116) / Baywood Dr	**D**	**F**	**F**	**F**
11	Petaluma Blvd / Lakeville St	**D**	C	**D**	C
12	East Washington St / Lakeville St	C	C	C	C
13	D St / Lakeville St	**D**	C	**D**	C

Source: Fehr & Peers Associates, Inc.
Notes: Bold font indicates LOS D or worse.
[1] For unsignalized intersections, level of service reported is for approach with highest delay.

r **Impact 6-1: Cumulative Plus Project Impact on the US 101 Northbound**
r **Ramps/Redwood Highway Intersection.** Under Cumulative No Project
r conditions, this intersection is expected to deteriorate from LOS C to LOS E
r during the AM peak hour and to LOS D during the PM peak hour. Under
r Cumulative Plus Project conditions (both scenarios), the intersection is expected
r to operate unacceptably at LOS F and LOS E in the AM and PM peak hours,
r respectively. The addition of project traffic is expected to increase the average delay at the intersection by 25.1 seconds under Project Scenario 1 and 20.1 seconds under Project Scenario 2. This effect would represent a ***potentially significant impact.*** (See criterion (1) under subsection 6.31, "Significance Criteria," above.)

Mitigation 6-1. Mitigation shall include reassigning the northbound off-ramp right-turn movement (which is currently stop-controlled) to a "free" northbound right-turn lane (i.e., a right turn lane that would not be controlled by the traffic signal) and associated receiving lane. The level of service analysis conducted for this EIR indicates that this improvement would provide acceptable operations
r (LOS B or better) during both peak hours under the Cumulative No Project and the Cumulative Plus Project scenarios. Implementation of this measure would reduce this potential impact to a ***less-than-significant level.***

r For finalization of such freeway ramp improvements, Caltrans defines a process
r of analyzing alternatives, selecting a preferred alternative, and designing
r interchange improvements. This process involves Caltrans production of Project
r Study Reports (PSR), Project Reports (PR), and Environmental Documents (ED),
r each of which has specific requirements for the level of design detail and types of
r transportation analysis. Queuing analysis and more detailed signal system
r operations analysis would be completed as part of these studies. These analyses
r may result in refinements to the specific mitigations identified in this EIR.

Impact 6-2: Cumulative Plus Project Impact on the US 101 Southbound Ramps/Redwood Highway Intersection. Under Cumulative No project conditions, the intersection is expected to maintain its current level of service (LOS C) during the PM peak hour. Under Cumulative Plus Project conditions (both scenarios), the intersection is expected to deteriorate from LOS C to LOS D during the PM peak hour. The addition of project traffic is expected to increase the average delay at the intersection by 4.0 seconds under Project Scenario 1 and 3.5 seconds under Project Scenario 2. This effect would represent a ***potentially significant impact.*** (See criterion (1) under subsection 6.3.1, "Significance Criteria," above.)

Mitigation 6-2. Mitigation for this impact shall include reassigning the southbound off-ramp right-turn movement (which is currently stop-controlled) to a "free" southbound right-turn lane (i.e., a right turn lane that would not be controlled by the traffic signal) and associated receiving lane. The level of service analysis conducted for this EIR indicates that this improvement would provide acceptable operations (LOS C) during the PM peak hour under the Cumulative Plus Project scenarios. Implementation of this measure would reduce this potential impact to a ***less-than-significant level***. In addition, the implementation of this measure would improve operations, but not to acceptable conditions, from LOS E to LOS D in the AM peak hour under the cumulative plus project scenarios.

For finalization of such freeway ramp improvements, Caltrans defines a process of analyzing alternatives, selecting a preferred alternative, and designing interchange improvements. This process involves Caltrans production of Project Study Reports (PSR), Project Reports (PR), and Environmental Documents (ED), each of which has specific requirements for the level of design detail and types of transportation analysis. Queuing analysis and more detailed signal system operations analysis would be completed as part of these studies. These analyses may result in refinements to the specific mitigations identified in this EIR.

Impact 6-3: Cumulative Plus Project Impact on the US 101 Southbound Ramps/East Washington Street Intersection. Under Cumulative No Project conditions, the intersection is expected to maintain its current level of service (LOS C) during the PM peak hour. The intersection is expected to deteriorate from LOS C to LOS E under Project Scenario 1 and LOS D under Project Scenario 2 during the PM peak hour. The addition of project traffic is expected to increase the average delay at the intersection by 29.5 seconds under Project Scenario 1 and 13.8 seconds under Project Scenario 2. This effect would represent a ***potentially significant impact.*** (See criterion (1) under subsection 6.31, "Significance Criteria," above.)

Mitigation 6-3. Mitigation for this impact shall include providing dual right-turn lanes at the southbound ramp and dual lefts on the westbound approach on Washington Street. The level of service analysis conducted for this EIR indicates that this improvement would provide acceptable operations during the PM peak hour under both project scenarios. Implementation of these measures would reduce this potential impact to a less-than-significant level. Similarly, these implementations would provide acceptable operations (LOS C) in the AM peak hour under Cumulative Plus Project Scenario 2. However, these improvements would improve traffic operations, but not to acceptable conditions, under Cumulative Plus Project Scenario 1. Therefore, this would constitute a ***significant unavoidable impact.***

For finalization of such freeway ramp improvements, Caltrans defines a process of analyzing alternatives, selecting a preferred alternative, and designing interchange improvements. This process involves Caltrans production of Project Study Reports (PSR), Project Reports (PR), and Environmental Documents (ED), each of which has specific requirements for the level of design detail and types of transportation analysis. Queuing analysis and more detailed signal system operations analysis would be completed as part of these studies. These analyses may result in refinements to the specific mitigations identified in this EIR.

Impact 6-4: Cumulative Plus Project Impact on the Lakeville Street/Caulfield Lane Intersection. Under all cumulative scenarios, the intersection is expected to operate unacceptably (LOS E or F) during both the AM and FM peak hours. In addition to project traffic, the expected changes in travel patterns and introduction of new roadways within the study area are expected to increase the delay by more than 80 seconds. This effect would represent a ***potentially significant impact.*** (See criterion (1) under subsection 6.31, "Significance Criteria," above.)

r **Mitigation 6-4.** Mitigation for this impact shall include providing an exclusive
r right-turn lane for the southbound approach on Lakeville Street and dual right-turn
r lanes for the westbound approach on Caulfield Lane. The level of service
r analysis conducted for this EIR indicates that these improvements would improve
r operations, but not to acceptable conditions, from LOS F to LOS E and D in the
r AM and PM peak hours, respectively, under Cumulative No Project conditions.
r However, under the cumulative plus project scenarios, these improvements will
r improve the average delay at the intersection, but maintain unacceptable
r operations at LOS F during both peak hours. Therefore, this would constitute a
r ***significant unavoidable impact*** for Scenarios 1 and 2.

7. CULTURAL AND HISTORIC RESOURCES

Possible impacts of the proposed Specific Plan on local prehistoric and historic cultural resources, and any warranted mitigation measures, are described in this EIR chapter. Information in this chapter was obtained from the Northwest Information Center (NWIC) of the California Historic Resources Information System at Sonoma State University, and a 2001 r *historic resources evaluation* report prepared by Carey & Co. Architecture, historic preservation r architects, to provide the preliminary historic resources information necessary to prepare the Specific Plan and this Specific Plan EIR.[1]

7.1 SETTING

7.1.1 Prehistoric and Archaeological Resources

An archival literature review was conducted in October 2001 by the Northwest Information Center (NWIC), located at Sonoma State University, to compile information about recorded historic and prehistoric site locations inside the proposed Central Petaluma planning area.[2] This literature review provided the basis for the following discussion of prehistoric resources in the area.

The Specific Plan area has been the site of very few archaeological field studies. In 1989, a survey of a 3.5 acre central area parcel was completed, with negative findings. In 1992, a different parcel of less than an acre was also surveyed with negative findings. In 1991, an r archaeologist conducted a program of hand augering of selected parcels that extended into the current Specific Plan area; no archaeological materials were discovered.

The level of past development activity that has occurred in the Specific Plan area and the condition of the ground in undeveloped portions of the area make it virtually impossible to visually identify the potential presence of subsurface cultural resources; they are either covered up or have been substantially altered. The Specific Plan area does, however, appear to have a high potential for the discovery of archaeological materials, and in particular, prehistoric materials, based upon anecdotal evidence and the discovery of two possible prehistoric archaeological resources reported inside the Specific Plan area. One possible

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[1]Carey & Co. Architecture, Inc., Petaluma Specific Plan Draft Historic Resource Evaluation; October, 2001.

[2]Haydu, Damon Mark; Northwest Information Center of the California Historic Resources Information System, written communication with Carey & Co. Architecture. October 22, 2001.

prehistoric site (C-1200) was reported by William Roop at the southern edge of the Specific Plan area as a "possible shell midden with lithics". This location has not been verified, and no formal archaeological site survey form has been prepared for the site.

The October 2001 report from the NWIC states that the Specific Plan area contains no recorded Native American cultural resources. Previously, in 1988, the NWIC reported on the findings of its research related to a proposed dredging plan for the Petaluma River near the western edge of the Specific Plan area. The study focus was the immediate bank areas of the river, which led the NWIC to comment on the presence of site Son-399/H, a combined historical site with a large prehistoric component of dark midden containing shellfish fragments. However, by the time the NWIC staff visited the site in 1988, the location as described by King in 1966 had undergone massive alteration, leading to the alteration or obliteration of large portions of the prehistoric site.

Nevertheless, even though no Native American cultural resources have been verified within the Specific Plan area, the area is located near historic marsh margins, including alluvial benches associated with the Petaluma River. The River is a prime location for potential Native American archaeological sites in this portion of Sonoma County. Several native American archaeological sites have been recorded both up-river and downriver of the immediate project vicinity. Given the environmental setting and the archaeologically sensitive nature of the general area, there is a high potential for Native American sites in the Specific Plan area.[1]

7.1.2 Historic Resources

(a) CEQA Definition of Historic Resources. Under CEQA (section 15064.5(a) of the *CEQA Guidelines*, the term "historic resources" includes (summarized from section 15064.5(a)):

- a resource listed in, or determined by the State Historical Resources Commission to be eligible for listing in, the California Register of Historic Resources;
- a resource included in a local register of historic resources, as defined in Public Resources Code section 5020.1(k), or identified as significant in a historical resources survey meeting the requirements of Public Resources Code section 5024.1(g), unless the preponderance of evidence demonstrates that it is not historical or historically significant;
- any object, building, structure, site, area, place, record, or manuscript which the lead agency (the City) determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or

[1]Haydu.

cultural annals of California, provided that the lead agency's determination is supported by substantial evidence; or

- an archeological site (CEQA Guidelines section 15064.5(c)).

(b) Specific Plan Area Historic Resource Evaluation. For specific plan formulation purposes, the City commissioned a historic preservation consultant to conduct a preliminary survey and identification of potential historic resources in the proposed Specific Plan area. A historic resource evaluation was conducted by Carey & Co. Architecture, historic preservation architects, to provide the preliminary historic resources information necessary to prepare the Specific Plan and this Specific Plan EIR. The results of the evaluation were presented in a report entitled Petaluma Specific Plan Draft Historic Resource Evaluation (Carey & Co. Architecture, Inc.; October 2001). The Carey & Co. evaluation was not designed or intended to provide a "local register of historic resources" as defined in Public Resources Code section 5020.1(k) or to meet the more extensive full "historic resources survey" criteria described in Public Resources Code section 5024.1(g). Rather, the evaluation was intended to provide preliminary historic resources information for planning purposes and for assisting the EIR authors in identifying potentials for historic resources impacts. Specifically, the Carey & Co. evaluation intent has been to evaluate the location and extent of potentially significant historic and architectural resources in the Specific Plan area--i.e., buildings, structures, sites, areas, or places that appear to merit local interest status and special consideration in the Specific Plan and Specific Plan formulation process. Based largely on the information provided in the Carey & Co. evaluation, the draft Specific Plan (historic preservation chapter) includes policies for recognizing historic resources, expanding the existing Petaluma Historic Commercial District designation, creating two additional local historic district designations, and conducting additional historic resource research.

The Carey & Co. evaluation was not intended to provide a definitive identification of "significant historic resources" meeting the requirements of Public Resources Code section 5024.1(g) or a formal, City-adopted "local register of historic resources," as defined in Public Resources Code Section 5020.1(k). The City may elect to proceed with such a full survey and/or listing process as a subsequent undertaking (i.e., as additional historic resource research) to implement the Specific Plan and/or meet mitigation needs identified in this EIR.

The Carey & Co. *historic resources evaluation* report does indicate that the Specific Plan area contains numerous potentially historic resources, including examples of historic agricultural, industrial, municipal and residential building types and associated potentially historic areas. The Carey & Co. evaluation identified 66 potentially significant historic properties within the proposed Specific Plan area boundary, including three already locally designated as City Historic Landmarks. There is also one area, the "Petaluma Historic Commercial District," listed in the National Register of Historic Places. In addition, the historic resources evaluation identified 20 properties that appear to merit a local interest status, and two additional areas that have the potential to be locally designated historic districts.

r Historic resources identified by the Carey & Co. *historic resources evaluation* report within each Specific Plan subarea are outlined below.

r (a) North River Subarea. The *historic resources evaluation* report identified 22 potentially significant historic resources in the North River subarea, including six industrial/agricultural

structures, seven commercial buildings and nine properties within the Petaluma Historic Commercial District (which is listed in the National Register of Historic Places). Two of the most prominent historic resources in the North River subarea are the Hunt and Behren's, Inc., grain, feed and poultry supply warehouse and the Dairymen's Feed and Supply Coop complex.

r (b) Turning Basin Subarea. The *historic resources evaluation* report identified 30 potentially significant historic resources in the Turning Basin subarea, including 17 industrial properties and 13 properties within the Petaluma Historic Commercial District (which is listed in the National Register of Historic Places). Prominent historic resources identified in this subarea
r include vestiges (sites) of the San Francisco and Northern Pacific Railroad, Petaluma and
r Santa Rosa Railroad, and the Petaluma Depot (three Northwestern Pacific Railroad buildings).

r (c) Riverfront Warehouse Subarea. The *historic resources evaluation* report identified 16 potentially significant historic resources in the Riverfront Warehouse subarea, including 12 industrial/agricultural resources and four residential resources. Prominent historic resources
r identified in this subarea include the A.W. Horwege Saddle Tree Factory building site, the
r Centennial Planing Mill & Box Factory building site, the Petaluma Fruit Canning Company
r building site, the Sonoma Preserve Company building site, the Corliss Gas Engine Company
r (became the Kresky company) building, and the Petaluma Box Factory and Foundry building.
r (Following common historic resources survey practice, these buildings are referred to by their
r historical occupants, although most or all of these businesses no longer occupy the buildings.)

r (d) Lower Reach Subarea. The *historic resources evaluation* report indicates that the Lower
r Reach subarea contains three potentially significant historic resources, including vestiges of
r the San Francisco and Northern Pacific Railroad, the City of Petaluma Sewer Plant, and the Jerico Dredging operation.

7.2 PERTINENT PLANS AND POLICIES

The following policies set forth in the *Community Character* chapter of the Petaluma General Plan, 1987-2005 are pertinent to consideration of Specific Plan effects on cultural and historic resources:

- *Objective (j): Preserve Petaluma's architectural heritage.*
- *Objective (k): Retain the unique qualities and architectural flavor of downtown and of West Side residential areas.*
- *Objective (l): Prevent the destruction of landmark buildings.*
- *Policy 16.1: The City encourages the restoration and re-use of historic buildings.*
- *Policy 17: All development and redevelopment shall add to, not detract from, existing significant, City-identified architectural landmarks, buildings, and areas.*

- *Policy 19: Require SPARC review of those infill construction projects in residential and commercial areas where compatibility with surrounding buildings and neighborhoods may be at issue.*
- *Objective (p): Promote greater sensitivity toward Petaluma's archaeological heritage.*
- *Policy 29: The City shall take all possible precautions to insure that no action by the City results in the loss of the irreplaceable archaeological record present in the City's jurisdiction.*

The following policies set forth in the *Local Economy* chapter of the Petaluma General Plan, 1987-2005 are also pertinent to consideration of Specific Plan effects on cultural and historic resources:

- *Objective (i): Reinforce the unique character of downtown.*
- *Policy 16: Future Central Business District (CBD) development shall respect and be compatible with the existing scale and historic and architectural character of downtown.*
- *Policy 19: The City shall encourage owners of downtown buildings to improve building exteriors consistent with the historic and visual character of the downtown.*

7.3 IMPACTS AND MITIGATION MEASURES

7.3.1 Significance Criteria

Based on the *CEQA Guidelines*,[1] the project and project-facilitated future development
r activities would be considered to have a *significant* or *potentially significant* cultural and/or historic resources impact if they would:

r (a) Cause or potentially cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;

r (b) Cause or potentially cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5;

(c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;

(d) Eliminate important examples of the major periods of California history or prehistory; or

[1] *CEQA Guidelines*, 2002. Section 15065(a); Appendix G, Item V a-d.

(e) Disturb any human remains, including those interred outside of formal cemeteries?

r For criteria (a) and (b) above, a "substantial adverse change in the significance of a historical
r resource" means physical demolition, destruction, relocation, or alteration of the resource or its
r immediate surroundings such that the significance of a historical resource would be "materially
r impaired." Under CEQA, the significance of a historical resource is "materially impaired" when
r a project demolishes or materially alters in an adverse manner those physical characteristics of
r a historical resource that convey its historical significance and that justify its inclusion in, or
r eligibility for, inclusion in the California Register of Historical Resources. [CEQA Guidelines
r section 15064.5(b).]

7.3.2 Impacts and Mitigation Measures

Impact 7-1: Disturbance of Archaeological Resources. New central area development and redevelopment permitted and encouraged by the Specific Plan could disturb existing unrecorded sensitive archaeological resources in the Specific Plan area. This possibility represents a ***potentially significant impact*** (see criteria (b), (d) and (e) under subsection 7.3.1, "Significance Criteria," above).

The Specific Plan area possesses a high potential for containing buried or obscured prehistoric cultural resources, particularly in the vicinity of the river. Due to the broad nature of the proposed Specific Plan and associated future central area development activities, and the lack of archaeological field data on the area, it is difficult to forecast the specific effects of future project-facilitated development on archaeological resources. However, as noted in subsection 7.1.1 above, because of the riverfront location, there is a high probability of encountering additional archaeological sites in the Specific Plan area during project-facilitated construction activities. These construction activities (e.g., grading, excavation) could disturb or destroy such archaeological resources (e.g., subsurface lithic materials, trash scatters, historic articles, etc.).

r

Mitigation 7-1: During the City's normal project-specific environmental review (Initial Study) process for all future, discretionary, public improvement and private development projects in the Specific Plan area, the City shall determine the possible presence of, and the potential impacts of the action on, archaeological resources. The individual project sponsor should be required to contact the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) to determine whether the particular project is located in a sensitive area. Future development projects that the CHRIS determines may be located in a
r sensitive area--i.e., on or adjoining an identified archaeological site or having the
r potential to contain an archaeological site--shall proceed only after the project sponsor contracts with a qualified archaeologist to conduct a determination in regard to cultural values remaining on the site and warranted mitigation measures.

In general, to make an adequate determination, the archaeologist should conduct a preliminary field inspection to: (1) assess the amount of visible ground-surface, (2) identify locations of visible ground-surface, (3) determine the nature and extent of previous impacts, and (4) assess the nature and extent of potential impacts. Such field inspection may demonstrate the need for some form of additional subsurface testing (e.g., excavation by auger, shovel, or backhoe unit). Alternatively, onsite monitoring of subsurface activities (i.e., during grading or trenching) may be needed.

(continued)

Mitigation 7-1 (continued):

If a significant archaeological resource is identified through this field inspection process, the City and project proponent shall seek to void damaging effects to the resource. Preservation in place to maintain the relationship between the artifact(s) and the archaeological context is the preferred manner of mitigating impacts to an archaeological site. Preservation may be accomplished by:

- Planning construction to avoid the archaeological site;
- Incorporating the site within a park, greenspace, or other open space element;
- Covering the site with a layer of chemically stable soil; or
- Deeding the site into a permanent conservation easement.

When in-place mitigation is determined by the City to be infeasible, a *data recovery plan*, which makes provisions for adequate recovery of the scientifically consequential information about the site, shall be prepared and adopted prior to any additional excavation being undertaken. Such studies must be submitted to the California Historical Resources Regional Information Center (i.e., the NWIC at Sonoma State University). If Native American artifacts are indicated, the studies must also be submitted to the Native American Heritage Commission. Identified
r cultural resources should be recorded on form DPR 523 (A-L) (archaeological sites). Mitigation measures recommended by these two groups and required by the City shall be undertaken, if necessary, prior to resumption of construction activities.

A *data recovery plan* and data recovery shall not be required if the City determines that testing or studies already completed have adequately recovered the necessary data, provided that the data have already been documented in another EIR and are available for review at the California Historical Resource Regional Information Center [*CEQA Guidelines* section 15126.4(b)].

In the event that subsurface cultural resources are otherwise encountered during approved ground-disturbing activities for a Specific Plan area construction activity, work in the immediate vicinity shall be stopped and a qualified archaeologist retained to evaluate the finds following the procedures described above.

If human remains are found, special rules set forth in State Health and Safety Code section 7050.5 and *CEQA Guidelines* section 15126.4(b) shall apply.

Implementation of this measure would reduce this impact to a ***less-than-significant level.***

Impact 7-2: Destruction/Degradation of Historic Resources. The Specific Plan (Historic Preservation chapter) contains policies for recognizing historic resources, expanding the existing Petaluma Historic Commercial District, creating two additional local historic districts, and conducting additional historical research. Nevertheless, future development projects that are otherwise consistent with the proposed Specific Plan may cause a substantial adverse change in either:

(a) a resource listed in, or determined by the State Historical Resources Commission to be eligible for listing in the California Register of Historic Resources;

(b) A resource included in a future local register of historic resources, as defined in Pubic Resources Code section 5020.1(k), or identified as significant in a future historical resources survey meeting the requirements of Public Resources Code section 5024.1(g); or

(c) An object, building, structure, site, or place which the City determines to be historically significant, supported by substantial evidence.

Affected resources could include one or more of the 66 potentially significant properties or one or two potentially significant additional areas identified in the October 2001 Carey & Co. *historic resources evaluation*, or additional resources not yet identified.

Substantial adverse changes that may occur include physical demolition, destruction, relocation, or alteration of one or more historic resources, such that the resource and/or the historic district in which it is located is "materially impaired." The significance of an historic resource is considered to be "materially impaired" when a project demolishes or materially alters the physical characteristics that justify the determination of its significance [*CEQA Guidelines* section 15064.5(b)]. Such an adverse change to a CEQA-defined historic resource would constitute a ***significant impact*** (see criteria (a), (b) and (d) under subsection 7.3.1, "Significance Criteria," above).

(a) Specific Plan Provisions for Historic Resources. As noted in the "Setting" section above, a *historic resources evaluation* was conducted by Carey & Co. Architecture in 2001 to provide the necessary information for preparation of the proposed Specific Plan and this Specific Plan EIR. The *historic resources evaluation* report identifies 66 potentially significant historic properties in the Specific Plan area (see subsection 7.1.2, "Historic Resources," above). Many of these potentially significant properties have not been previously designated or recognized. In addition, the *historic resources evaluation* report recommends extension of the existing Petaluma Historic Commercial District and designation to encompass a local historic area in the Riverfront Warehouse subarea that contains a

collection of buildings that are not necessarily individually significant, but form an environment which is distinguished by its continuity, setting, urban design features, and integrity.

r The proposed Specific Plan includes policies calling for this district expansion, along with
r creation of two additional local historic districts and recognition of individual historic resources (see subsection 3.6.7, "Historic Preservation," in section 3, Project Description, of this EIR). In addition, the Specific Plan proposes nominating four properties in the Riverfront Warehouse subarea, as well as the Sewer Plant and Jerico Dredging properties in the Lower Reach subarea, for local historic landmark designation. Nevertheless, it is possible that a future development project that is otherwise consistent with the Specific Plan would involve building demolition or other substantial changes that would "materially impair" the historic resource or an historic district within the Specific Plan area.

r

r (b) Determining the Impacts of Future Site-Specific Actions. In determining if future specific
r development actions to be undertaken within the Specific Plan area will result in a significant impact on one or more historic resources, the *CEQA Guidelines* essentially call for a two-part test: (1) is the resource "historically significant," and (2) would the project cause a "substantial adverse change" in the significance of the resource. Under section 15064.5(a) of the *CEQA Guidelines*, a historic resource shall be presumed to be historically or culturally significant if it is a resource that is included in a local register of historic resources, or identified as significant in a historical resources survey meeting the requirements of section 5024.1(g) of the State Public Resources Code (PRC), or listed in, or deemed to be eligible for, listing in the California Register of Historic Resources or the National Register of Historic
r Places. The 66 "potentially significant" historic properties identified in the survey are
r presumed in this Specific Plan EIR to be historically or culturally significant unless the preponderance of evidence demonstrates that they are not historically or

culturally significant.[1] The potential for "substantial adverse change" due to individual development projects proposed under the Specific Plan would be evaluated on a case-by-case basis in accordance with *CEQA Guidelines* section 15064.5(b).

Mitigation 7-2: Generally, for any future discretionary action within the Specific Plan area that the City determines through the CEQA-required Initial Study review process may cause a "substantial adverse change" in one or more potentially significant historic resources in the Specific Plan area, the City and applicant shall incorporate measures that would seek to improve the affected historic resource in accordance with either of the following publications:

- Secretary of Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*; or

- Secretary of Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*.

Successful incorporation of these measures would reduce the impact to a ***less-than-significant level*** [*CEQA Guidelines* section 15126.4(b)]. This mitigation shall be made enforceable by its incorporation into the Specific Plan as a City-adopted policy and requirement to be implemented through subsequent permits, conditions, agreements or other measures, pursuant to *CEQA Guidelines* section 15064.5(b)(3-5).

For any future discretionary action permitted under this Specific Plan that would result in the demolition of a CEQA-defined historic resource, or otherwise cause the significance of the resource to be "materially impaired," the City must determine whether through the Initial Study process for that action that the above mitigation measures will not be adequate under CEQA, i.e., will not reduce the effects of the demolition to a less-than-significant level, and that the resulting potential for a significant impact is unavoidable, thereby requiring a project-specific EIR [CEQA Guidelines section 15064.5(a) and (b)]. The Specific Plan-related potential for building demolition and resulting effects on historic resources and/or historic districts therefore also represent a ***significant, unavoidable impact***.

[1]Bass, et al., CEQA Deskbook, 1999 (Second Edition), Solano Press Books, November 2000; page 104.

- *Objective (p): Carry out capital improvement projects that will enhance the efficiency of the supply system and insure adequate supplies for the future.*

- *Policy 31: The City shall determine the demand for water for the expected population within the Petaluma water service area, and shall consider the impacts of a peak drought or peak fire-fighting demand and determine how it would operate during a drought.*

- *Objective (s): Protect areas that are critical to the maintenance of water quality, including critical groundwater recharge areas.*

- *Policy 35: The City shall preserve adequate vegetative cover and prevent development which increases erosion and sedimentation potential along streams or in unstable soil areas.*

- *Policy 36: The City shall seek to preserve public and private watershed lands as permanent open space.*

- *Program (29.1): Work with the County to reduce ag-related contamination of groundwater and streams flowing into the Petaluma River.*

8.2 WATER

8.2.1 Setting

The City of Petaluma operates a municipal water distribution system within the City and in various contiguous peripheral areas. The principal source of Petaluma's water (90 percent) is the Sonoma County Water Agency (SCWA) regional supply system, which delivers water to the City and other users via the SCWA regional aqueduct. The primary source of water for the
r SCWA aqueduct is the alluvial aquifer of the Russian River. Water is extracted from the river
r aquifer via five collector wells adjacent to the river, taken from the river and treated
r (chlorination and pH adjustment) before being transferred into the SCWA aqueduct. The City obtains the remaining 10 percent of its water supply (including its entire emergency supply) from wells and recycled water. The City has a number of active wells on emergency standby and a small surface water treatment plant to supplement the SCWA aqueduct supply.

The City's water system served a population of approximately 55,270 in the year 2000. The City's average annual water demand is projected to increase from 9.9 mgd in 2000 to 13.0 mgd in 2020.[1] The Specific Plan area lies at the floor of the Petaluma Valley where water pressure can be optimized, depending on the delivery system. With an elevation range of

[1]Dyett & Bhatia, Petaluma General Plan 2000-2020. Existing Conditions, Opportunities, and Challenges Report, Second Administrative Review Draft. October 1, 2002; p. 9-5.

approximately seven to 32 feet, the entire Specific Plan area falls within Petaluma Water Service Zone I (0 to 60 feet) for service and fire flow water.

r Current demands on the SCWA do not exceed their water rights. Current peak summer
r demands can, however, exceed the Agency's physical ability to deliver water. This temporary
r impairment will be addressed with the completion of Collector #6 now under construction.[1] The
r EIR for this SCWA Water Supply and Transmission System Project (WSTSP) was certified in
r 1998. This certification was challenged and upheld in court in 2000. An appeal is pending.[2]

The 33-inch SCWA aqueduct runs underneath Petaluma Boulevard and consists of old cast iron and steel. Meeting peak water demands can exceed the SCWA aqueduct's intended capacity. The City's major water distribution facilities consist of six active SCWA turnouts and one standby turnout at Washington Street. The Washington Street turnout (12-inch diameter) provides the primary Zone I connection crossing the river and U.S. 101 and serves as the only northeast-southwest connector in town. Reservoir tanks at Oak Hill and Washington Street provide six million gallons of storage capacity to Zone I, providing excellent water pressure to the proposed Specific Plan area.

The Washington Street main line feeds a series of distribution lines within the Specific Plan area ranging in size from 6 to 8 inches and consisting of cast iron, ductile iron, welded steel, asbestos concrete (AC), and polyvinyl chloride (PVC) pipe. Many of the distribution pipes in the Specific Plan area are the oldest in town, some dating from the 19th century, and were installed incrementally without the benefit of a master plan. The City has experienced main
r breaks with cast iron pipe in the older sections of the City.[3] Additionally, there are only a few loop connections among pipes vital to the provision of adequate fire flow in the Specific Plan area.

This combination of aging pipes of inadequate size and outdated materials and the lack of loop connections combine to make the water service system within the Specific Plan area inadequate for existing and new development, for both normal service and fire protection purposes.

8.2.2 Significance Criteria

The project may be considered in this EIR to have a *potentially significant impact* on water
r service if it or its growth-inducing effects would:[4]

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r [1]Marc Bautista, Environmental Specialist, SCWA; April 21, 2003 letter to Petaluma Community
r Development Director.

r [2]Ibid.

[3]Dyett & Bhatia, p. 9-20.

[4]*CEQA Guidelines*, Appendix G, Items VIII (b) and XVI (b) and (d).

(a) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted); and/or

(b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;

(c) Result in the need for new or expanded water supply entitlements to serve the Specific Plan area because existing water supplies available to serve the area from existing entitlements and resources are not sufficient.

8.2.3 Impacts and Mitigation Measures

Additional development facilitated by or otherwise associated with implementation of the proposed Central Petaluma Specific Plan and associated increases in commercial activity, employment, and residential population (see housing, population and employment increase figures in section 5.3 herein), would result in corresponding increases in the demand for water supply. The City as water purveyor is prepared to provide the additional domestic water necessary for anticipated additional development in the Specific Plan area, including anticipated project-facilitated commercial growth and population increases, with their existing entitlements and distribution systems.

As noted in subsection 8.2.1 above, potential delays or barriers to completing the Water
r Supply and Transmission System Project (WSTSP) facilities will be greatly minimized if and
r when the appellate court confirms the validity of the WSTSP Project EIR. This appellate court
r decision will be necessary to uphold the water allocation to be provided to the SCWA service
r area and contractors.

Specific projects within the Specific Plan area will be required to include assessments of available water supply to serve the individual project. In accordance with recent California case law (*County of Amador v. El Dorado Water Agency* and *United Water Conservation District v. County of Los Angeles*), no building permit for a site-specific development proposal

in the Specific Plan area, including any project-facilitated development, can be issued until an adequate existing and future source and supply of water can be demonstrated by the water provider serving the development site.[1]

r The City of Petaluma is the water supplier for the Specific Plan area. If the City concludes that
r its supplies are insufficient, the City must establish plans for additional water supplies, including the following:

- Estimated total costs, and methods of financing the costs, associated with acquiring additional water supplies;
- A list of all federal, state, and local permits, approvals, or other entitlements necessary to acquire or develop the additional water supplies;
- Estimated time frames for acquiring the additional water supplies; and
- An overall water conservation program, including a plan for utilizing recycled water and a program for allocating water during a water emergency.

The Planning Commission will then determine whether projected water supplies will be sufficient to satisfy the demands of future individual, Specific Plan-facilitated site-specific development proposals, in addition to existing and other anticipated (planned) future uses within the affected water service area. If the Planning Commission determines that projected water supplies will not be sufficient, proposed developments will not be approved.

Based on these considerations, anticipated project-facilitated growth within the Specific Plan area would be considered to have a ***less-than-significant impact*** related to water supply service (see criteria (b) through (d) under subsection 8.2.2, "Significance Criteria," above).

Mitigation. No significant impacts have been identified; no mitigation is required.

Anticipated Water Delivery System Impacts. The City's principal water supply is delivered via the Sonoma County Water Agency (SCWA) regional aqueduct. The 33-inch segment of the SCWA aqueduct that runs underneath Petaluma Boulevard consists of old cast iron and steel. Meeting peak water demands can currently exceed the intended capacity of the aqueduct. In addition, many of the distribution pipes in the Specific Plan area are the oldest in town, and there are only a few connections among Specific Plan area pipes vital to the provision of adequate fire flow. Aging pipes of inadequate size and outdated materials, plus

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[1]Bass, et al., CEQA Deskbook: 1999 (Second Edition), Solano Press Books; p. 106.

Mitigation 13-4: Require and review geologic reports prior to decisions on any Specific Plan-facilitated discretionary development or improvements in the Specific Plan area that may subject property to significant shrink-swell (expansive soil) induced damage. The geotechnical report shall describe the potential for expansive soil hazards and identify the engineering specifications necessary to reduce expansive soil impacts to an acceptable level; where appropriate, require geotechnical engineer or engineering geologist's certification that expansive soil risks have been adequately reduced to an acceptable level. The identified
r engineering measures could include, but are not limited to: removal of the
r material, lime treatment of the expansive soil, capping the expansive soil with nonexpansive, thickened and/or post tensioned floor slabs, and deepened foundations that gain support before the expansive soil or cut off the movement of moisture below buildings. Implementation of this measure would reduce the impact to a ***less-than-significant level.***

14.1.2 Hazardous Materials in the Specific Plan area Vicinity

(a) Activities Involving Hazardous Materials Storage, Handling or Transport. Hazardous materials or waste have been and are commonly used in certain central area commercial, industrial and agricultural processing operations, and in a more limited extent, in residential areas. The aforementioned Phase I Hazardous Materials Assessment was prepared starting with a Specific Plan area land use history overview which was completed by reviewing: (a) historic Sanborn Fire Insurance Maps of Petaluma (1885, 1899, 1906, 1923, 1949, and 1965), and (b) historical aerial photographs (1953, 1957, 1965, 1972, 1982, and 1983) of the area. In addition, public records obtained from government regulatory databases[1] provided pertinent information on potentially hazardous materials sites within and within a one-mile radius of the Specific Plan area boundary.

The main potential sources of hazardous materials and waste identified in the Specific Plan area vicinity included:

- Underground storage tanks (USTs),
- Above ground storage tanks (ASTs),
- Hazardous wastes storage and handling activities, and
- Non-point sources of pollutants (urban runoff) to stormwater and the San Francisco Bay.

The *Central Area Specific Plan Phase I Site Assessment* indicated that 43 suspected and/or documented sources of petroleum hydrocarbon and/or hazardous materials contamination existed within the Specific Plan area in June of 1998. The majority of the listed locations, about 32 of the 43 suspected/documented sources, were identified as having registered and/or leaking underground storage tank (USTs) possibly containing hazardous materials. The remainder of the locations, approximately five, were identified has having a known release of hazardous materials from sources other than leaking USTs--i.e., suspected metal, solvent, and/or coal gas waste contamination. Of the 43 sites identified, 27 were identified from regulatory agency databases, and the remainder were identified by reviewing the Sanborn Maps and aerial photographs.

(b) Asbestos and PCB Potentials. Older commercial, industrial and residential buildings
r within the Specific Plan area could contain asbestos-containing materials (ACMs),
r polychlorinated biphenyls (PCBs), and lead-based paint (LBP).

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[1] A record search of databases from the following state and federal agencies was conducted: California Department of Toxic Substance Control ("Cal-Sites Database" and Hazardous Waste Information System), California Environmental Protection Agency (CAL-EPA), State Water Resources Control Board (Leaking Underground Storage Tank Information System, and Hazardous Substance Container Database, and Waste Discharge System database) and U.S. EPA database.

r ACMs can exist in roof, insulation, paneling, floor, and other building materials, as well as in
r exterior pavements, structural concrete, or underground utilities. The adverse health effects
r associated with exposure to friable asbestos have been extensively studied. Studies have demonstrated that inhalation of asbestos fibers may lead to increased risk of developing respiratory or abdominal cancers. There is no known safe level of exposure. The presence of asbestos in a building does not necessarily mean that the building poses a health hazard. In many cases, the asbestos within buildings is inaccessible or sealed within another material, and thus unable to cause a health hazard. However, asbestos fibers can be released during building renovation or demolition, unless proper precautions are taken.

The removal, handling, transport and disposal of asbestos is heavily regulated at the federal, state and local levels. These regulations are designed to minimize any exposure of onsite employees (e.g., construction workers) and the general public to asbestos. The US EPA provides asbestos standards. The federal Occupational Safety and Health Administration (OSHA) and its state counterpart, CalOSHA, regulate various aspects of asbestos removal, handling and disposal, to ensure worker safety. Transport and disposal of asbestos-containing material is also regulated.

PCBs are another potentially hazardous class of compounds commonly found in the electrical transformers in older commercial buildings. While manufacture of PCBs has been banned since 1977, some older pieces of equipment may still contain PCBs.

r
r Older buildings in the Specific Plan area could also contain lead-based paint (LBP). LBP can
r be toxic, with adverse health effects if safe work and disposal practices are not followed
r during demolition.

14.2 PERTINENT PLANS, POLICIES AND REGULATIONS

14.2.1 Petaluma General Plan (1987-2005)

The following goals and objectives from the City's adopted Petaluma General Plan *Community Health and Safety Element* are pertinent to consideration of the health and safety implications of the proposed Specific Plan:

- *Goal 1: Strive to protect the community from injury, loss of life, and property damage resulting from natural catastrophes and any hazardous conditions.*
- *Goal 2: Strive to reduce the impact of pollutants on the well-being of Petalumans.*
- *Objective (b): Avoid land uses that threaten public safety and/or that may result in property damage.*

- *Objective (l): Protect the community's health, safety, welfare, natural resources, and property through regulation of authorized (and elimination of unauthorized) use, storage, transport, and disposal of hazardous materials, with specific focus on problem prevention.*

(b) Surface or Groundwater Contamination. In order to reduce potential health hazards due to construction personnel or future occupant exposure to surface water or groundwater contamination, developers would complete the following steps for each site proposed for disturbance as part of a project-facilitated construction activity in the Specific Plan area:

Step 1. Investigate the site to determine whether it has a record of hazardous material discharge into surface or groundwater, and if so, characterize the site according to the nature and extent of contamination that is present before development activities proceed at that site.

Step 2. Install drainage improvements in order to prevent transport and spreading of hazardous materials that may spill or accumulate on industrial sites.

Step 3. If investigations indicate evidence of chemical/environmental hazards in site surface water and/or groundwater, then mitigation measures acceptable to the RWQCB would be required to remediate the site prior to development activity.

Step 4. Inform construction personnel of the proximity to recognized contaminated sites and advise them of health and safety procedures to prevent exposure to hazardous chemicals in surface water/ground water.

Mitigation. No significant additional adverse impacts have been identified; no additional mitigation is required.

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r **Potential Asbestos, Lead-Based Paint, and PCB Exposure.** Specific Plan-facilitated alteration, renovation or demolition of existing structures within the Specific Plan area have the
r potential for exposing construction workers and the general public to friable asbestos, lead-
r based paint (LBP), and/or PCBs. Therefore, as a condition of project-facilitated alteration, renovation or demolition permit approval for buildings within the Specific Plan area, the City would routinely require the project applicant to coordinate with the Bay Area Air Quality
r Management District (BAAQMD) to determine if ACMs, LBP, or PCBs are present.

r Ensuring proper identification and removal of ACMs, LBP, and/or PCBs requires each project applicant to complete the following steps.

r Step 1. Thoroughly survey the project site and existing structures for the presence of ACM,
r LBP, or PCBs. The survey shall be performed by a person who is properly certified by OSHA and has taken and passed an EPA-approved building inspector course.

Step 2. If building elements containing any amount of asbestos are present, prepare a written *Asbestos Abatement Plan* describing activities and procedures for removal,

handling and disposal of these building elements using the most appropriate procedures, work practices and engineering controls.

Step 3. Provide the asbestos survey findings, the written *Asbestos Abatement Plan* (if necessary), and notification of intent to demolish to the City of Petaluma and Sonoma County Department of Environmental Health at least ten days prior to commencement of demolition.

r

r Step 4. Assume that all painted surfaces in buildings over 10 years old include lead-based
r paint, abate the LBP or conduct an LBP assessment of the buildings, and implement
r associated remediation (lead-safe work practices and appropriate disposal practices)
r in accordance with applicable federal, state, and Sonoma County regulations.

r Step 5. Remove any potentially PCB-containing onsite transformers prior to demolition of non-residential buildings.

Implementation of these required measures would be expected to reduce the potentially significant health and safety impacts associated with asbestos removal and PCBs to a ***less-than-significant level***.

Mitigation. No significant adverse impacts have been identified; no additional mitigation is required.

Existing and Future Hazardous Materials Use. Hazardous substances may be stored, generated, and/or used in association with existing or project-facilitated new commercial, industrial or other uses within the Specific Plan area. Future Specific Plan area occupants may be exposed to accidental spillage or leakage of hazardous materials stored in onsite commercial and industrial areas. Industrial chemicals, fuels, paints, solvents, and oil products are among the hazardous materials that may be stored and used.

All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state, and federal regulations. Some of these regulations may include posting of signs, fire department notification, and specialized containment facilities.

The City routinely requires all project-facilitated new commercial, industrial and other uses to follow applicable regulations and guidelines regarding the storage and handling of hazardous waste within the Specific Plan area. For commercial and industrial facilities processing large amounts of hazardous materials, the City routinely requires adequate safety buffering between the area where hazardous materials are stored or handled and any residential uses in the vicinity. These normal measures would be expected to reduce the potentially significant health and safety impacts associated with project-related potential exposure to stored hazardous materials to a ***less-than-significant level***.

Mitigation. No significant additional adverse impact has been identified; no additional mitigation is required.