16. PROJECT CONSISTENCY WITH LOCAL AND REGIONAL PLANS

This EIR chapter includes an evaluation of the consistency of the proposed Specific Plan with pertinent goal and policies of relevant adopted local and regional plans. Section 15125(d) of the CEQA Guidelines requires EIRs to "...discuss any inconsistencies between the proposed project and applicable general plans and regional plans." The objective of such a discussion is to find ways to modify the project if warranted to reduce any identified inconsistencies with relevant plans and policies.

16.1 LOCAL PLANS

The location where growth and development can be expected to occur in the proposed Specific Plan area is influenced by a number of factors including site size and configuration, access, site visibility, flood conditions, biological resources, ground stability, sewer service, water availability, and the cost of land. The primary development pattern determinants, however, will be the adopted land use and development policies of the adopted Petaluma General Plan and the proposed Specific Plan pertaining to Specific Plan area land use, housing, open space, resource conservation, public safety, circulation and public facilities and services.


The specific goals and objectives outlined in the proposed Specific Plan have been designed to be consistent with and serve to implement the more general goals and objectives of the City's adopted General Plan. It is also anticipated that the proposed Specific Plan will be used, to the maximum extent feasible, to implement the goals, and policies of the impending General Plan update. A primary goal of the proposed Specific Plan is to assure that project-facilitated future development and revitalization in the Specific Plan area is compatible with existing development and environmental conditions, complements and enhances existing residential and commercial neighborhoods, and provides improved economic development opportunities, all in a manner which is consistent with adopted and future Petaluma General Plan policies. The intensity of any Specific Plan-facilitated retail, commercial or industrial development will also be required to comply with all pertinent guidelines set forth in the Petaluma Zoning Ordinance.

To determine more specifically how the proposed Specific Plan and its related effects relate to adopted General Plan policy, each environmental analysis section of this EIR (Land Use; Population, Housing and Employment; Transportation and Parking; Drainage and Water Quality; etc.), includes a subsection ("Pertinent Plans and Policies") that describes those
applicable General Plan policies which were adopted for the purpose of avoiding or mitigating a pertinent environmental effect.¹

Where the project or its potential environmental effects have been found in this EIR to be potentially inconsistent with one or more adopted Petaluma General Plan policies, a potentially significant environmental impact has been identified, and one or more mitigations have been identified to reduce the impact and thereby ensure General Plan consistency.

16.2 REGIONAL PLANS

16.2.1 Air Quality

In California, the State Air Resources Board coordinates and oversees both state and federal air quality control programs. The Board's primary functions include establishing and updating the California ambient air quality standards, monitoring existing air quality, controlling emissions from mobile sources, and developing the State Implementation Plan. The State Implementation Plan is the state's overall air quality control strategy for both mobile and stationary sources. Control programs for these sources are carried out at the regional or county level. These policies have been considered in section 11 of this EIR (see section 11.2) in evaluating the direct and indirect impacts of the Specific Plan on air quality.

16.2.2 Regional Land Use Policy Framework (ABAG)

The most recent regional land use policy document adopted by the Association of Bay Area Governments (ABAG) is entitled A Proposed Land Use Policy Framework for the San Francisco Bay Area, and was adopted by the ABAG Executive Board in July 1990. The document is described as a regional policy framework for future land use decisions in the Bay Area that respects the need for strong local control, but that also recognizes the importance of regional comprehensive planning for issues of regional significance. The document contains policies that (1) direct growth where regional infrastructure (e.g., freeways, transit, water, solid waste disposal, sewage treatment) is available and natural resources will not be overburdened, (2) encourage development that discourages long-distance commuting, (3) establish firm growth boundaries, and (4) encourage provision of housing at all levels. The proposed Specific Plan would be generally consistent with these policies, in that it (1) could be served by existing regional infrastructure systems, with improvements as recommended in sections 6 (Transportation and Parking), 8 (Public Facilities and Services), and 12 (Drainage and Water Quality); (2) would facilitate increased local employment growth and provide improved housing opportunities that together would assist the City in achieving a better balance between local jobs and employed residents, thereby reducing the need for long-distance commuting;

¹ CEQA Guidelines section 15125(d) and Appendix G, section IX(b).
(3) would foster urban development only where permitted by the Petaluma General Plan, as it currently exists, and as it may be amended from time to time; and (4) would assist in providing improved housing opportunity within the City.
17. ALTERNATIVES TO THE PROPOSED PROJECT

The potential environmental consequences of the proposed Draft Central Petaluma Specific Plan have been analyzed in detail in this EIR. Four alternatives to the proposed project are discussed in this section to provide a basis for further understanding of the environmental effects of the project and possible approaches to reducing identified significant impacts, and to meet CEQA requirements for EIR content. The four alternatives are listed below.

- **No Project Alternative--Existing Conditions.** The CEQA-required "no-project" alternative assumes that the Specific Plan would not be adopted, and the mix of land uses, undeveloped and underdeveloped conditions in the Specific Plan area would remain as they are now.

- **Existing General Plan Alternative--Specific Plan Area Buildout Under Existing General Plan Policies (without the Specific Plan).** This alternative represents what could reasonably be expected to occur over the 20 year project buildout horizon, based on the level of site buildout achievable under the current General Plan and zoning designations for the Specific Plan area, if the Specific Plan were not adopted.

- **1999 Draft Specific Plan Alternative--Buildout Under Previously-Proposed Specific Plan Policies.** This alternative evaluates the comparative impacts of buildout of the Petaluma central area under the policies of the previously proposed 1999 Draft Specific Plan, which provided for a greater variety of land use designations in the Specific Plan area and a reduced amount of allowable development as compared to the currently proposed project.

- **Mitigated Project Alternative.** This alternative represents a Specific Plan similar to the proposed project, but which incorporates all of the mitigation measures identified in the EIR. This alternative is included for purposes of comparing the environmental implications of the other alternatives with the project as proposed, but modified to incorporate all the mitigations identified in the EIR.

For purposes of comparison, the proposed project to the alternatives described herein, Table 3.1 (from the Project Description) which shows development potential in the Specific Plan area is repeated on the following page.
### Table 3.1
**DEVELOPMENT POTENTIAL IN THE SPECIFIC PLAN AREA**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>North River</td>
<td>2,615,394 sf</td>
<td>1,044 du</td>
<td>1,890,492 sf</td>
<td>261 du/472,623 sf</td>
</tr>
<tr>
<td>Turning Basin</td>
<td>3,429,358 sf</td>
<td>1,440 du</td>
<td>2,272,504 sf</td>
<td>360 du/568,126 sf</td>
</tr>
<tr>
<td>Riverfront Warehouse</td>
<td>2,996,227 sf</td>
<td>1,269 du</td>
<td>1,556,271 sf</td>
<td>317 du/389,067 sf</td>
</tr>
<tr>
<td>Lower Reach</td>
<td>7,024,560 sf</td>
<td>2,716 du</td>
<td>6,250,915 sf</td>
<td>679 du/1,562,728 sf</td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td>16,065,539 sf</td>
<td>6,469 du</td>
<td>11,970,182 sf</td>
<td>1,617 du/2,992,546 sf</td>
</tr>
</tbody>
</table>

**SOURCE:** City of Petaluma Community Development Department, March 2002

**Notes:**
- du=dwelling unit
- ac=acre
- sf=square feet
17.1 NO PROJECT ALTERNATIVE--EXISTING CONDITIONS

17.1.1 Principal Characteristics

Under this No Project Alternative, the Specific Plan would not be adopted, and existing conditions in the Specific Plan area would remain as they are today. Additional private commercial, industrial, and residential development within the Specific Plan area would not occur. Existing underutilized parcels (many along the riverfront) would not be redeveloped, new housing and commercial development would not occur, two new future transit centers (at the historic Petaluma Depot and on Caulfield Lane) would not be provided, infrastructure and public amenities would not be improved or upgraded, and public access to the river would not be improved.

The No Project Alternative would not meet the project objectives that call for redirecting growth into Central Petaluma, reconnecting the City to and along the river, encouraging diversity in transportation modes, reinforcing the working character of Petaluma’s waterfront, and enhancing the Specific Plan area’s physical structure and identity.

17.1.2 Comparative Impacts and Mitigating Effects

a. Land Use. The City estimates that the Specific Plan Area contains approximately 27 acres of developable vacant land, plus at least 40 or more acres of developable underutilized land (see discussion under subsection 17.2.1 below). The development anticipated in this EIR on the vacant and additional underutilized properties in the Specific Plan area would not occur. Infrastructure improvements, land assembly and other actions associated with the project would not occur or would be delayed. As a result, existing land use compatibility problems in these areas would be less likely to be resolved through new development. Land would continue to be underutilized and in some cases, would remain vacant. This alternative would not result in more efficient land use patterns proposed in the Specific Plan that take advantage of the central location of the planning area, its location near the historic downtown, the amenity of the river, and potential future transit stops.

b. Population, Employment and Housing. Under the No Project Alternative, the population and number of housing units and jobs in the Specific Plan area would not increase over existing levels. This alternative would therefore have fewer traffic, noise, and other impacts, compared to the proposed project. However, the lack of development would mean that no new housing units or jobs would be created for existing Petaluma residents, and that the existing jobs/housing imbalance would not improve.

c. Transportation and Circulation. Under the No Project Alternative, all significant unavoidable traffic impacts identified for the proposed project would be expected to be avoided, although some streets within the Specific Plan area may experience unacceptable levels of service based on background growth that would occur elsewhere in Petaluma and the surrounding region.
d. Cultural and Historic Resources. All potential impacts resulting from demolition of existing cultural resources or "material impairment" of designated historic resources (see definition and discussion in subsection 7.3.2 of this EIR) related to Specific Plan facilitated development would be avoided with the No Project Alternative, since this alternative assumes no additional development in the project area. However, some historic resource renovations that would potentially occur with the proposed Specific Plan would not occur under the No Project Alternative.

e. Public Services and Utilities. A new park would not be developed on the McNear peninsula. Proposed project-assisted facilities improvements would not occur. As a result, existing infrastructure and public services deficiencies would continue. On the other hand, this alternative would result in less demand for increased public services, at least in the short-term, since it would not facilitate new development in the Specific Plan area.

f. Visual Factors. This alternative would avoid the project's potential effects on valued visual resources in the Specific Plan area, including but not limited to buildings along Water Street and other riverfront locations, as well as other potential impacts on the visual environment. However, the potential for betterment of the visual environment from development of vacant and underutilized land and implementation of streetscape improvements, especially on currently degraded streetscapes such as the Specific Plan area segment of Washington Street, would also not occur.

g. Noise. Under the No Project Alternative, the construction-period noise impacts directly associated with anticipated development (e.g., roadway improvements, new building construction) in the Specific Plan area would not occur. Potential long-term noise impacts due to land use changes and increased traffic that would be facilitated by the proposed project would also not occur.

h. Air Quality. The No Project Alternative would have no short-term air quality impacts related to construction, and no long-term air quality impacts related to increases in traffic. The significant unavoidable impacts related to air quality and increases in emissions would be avoided with the No Project Alternative.

i. Storm Drainage, Flood Control and Water Quality. The No Project Alternative would result in fewer drainage system capacity, water quality, and localized flooding impacts, compared with the proposed Specific Plan. In addition, no new structures would be introduced within the Petaluma River flood plain. However, the beneficial effects of project-facilitated storm drainage and flood control improvements would not occur.

j. Geology, Soils and Seismicity. The seismic hazards that may be present in the Specific Plan area will continue to exist whether or not the Specific Plan area is developed. Under the No Project Alternative, however, fewer people and less improved property would be subject to seismic and soils-related hazards identified in the Specific Plan area. Seismic events may therefore cause less damage or injury under this alternative, compared to the proposed
Specific Plan. However, the beneficial effects (related to seismic safety) of project-facilitated building rehabilitation, facade improvements, and demolition of dilapidated buildings would not occur.

k. Hazardous Materials. Since no new development would occur under this alternative, no construction workers or new building occupants would be subject to hazardous materials exposure.

l. Biological Resources. Generalized impacts on vegetation and wildlife associated with the proposed project would not occur, at least in the near term. Potential impacts on special status species habitats and jurisdictional wetlands would also not occur. Unlike the proposed project, however, this alternative would not provide for improvement of approximately 30 acres of riverfront open space on underutilized industrial land and development of an approximately 28-acre park on the McNear peninsula. The No Project Alternative would therefore contribute to a greater overall loss of habitat in the long term, compared to the proposed project.

17.2 GENERAL PLAN BUILDOUT ALTERNATIVE

17.2.1 Principal Characteristics

Under the General Plan Buildout Alternative, the Specific Plan would not be adopted. While the existing Petaluma General Plan and existing zoning designations would remain in effect in the Specific Plan area, no actions would be taken by the City to develop property as outlined in the Specific Plan or to complete infrastructure and facility improvements. In general, minimal new development and/or redevelopment in central Petaluma would occur. The rate of residential, commercial, and industrial development in the Specific Plan area would be substantially lower than it would be with the proposed project; existing commercial and industrial land uses would be continued. No new residential development would occur in central Petaluma under the General Plan Buildout Alternative. Some increase and intensification of retail, commercial, and industrial uses would occur in the South River subarea.

The Existing Conditions report for the ongoing Petaluma General Plan update estimates the total vacant and underutilized acreage in the Specific Plan Specific Plan area at 55.1 acres. Subtracting the vacant approximately 28-acre McNear Peninsula (which would be developed as a park under this alternative), approximately 27.1 acres of vacant land in the Specific Plan area are available for development. In addition, based on Specific Plan Figure 7, "Framework for Change," approximately 43 acres of developable underutilized industrial lands identified as "opportunity areas" in the Specific Plan also exist in the Specific Plan area.

This EIR analysis assumes that development would occur on the 27.1 acres of vacant land and 43 acres of underutilized industrial land at the maximum development potential level anticipated under the current Petaluma General Plan and Zoning Ordinance, with the same 25-
percent development cap imposed under the Specific Plan buildout scenario. See Chapter 3, Project Description, for additional details regarding the Specific Plan buildout scenario.

Tables 17.1 and 17.2 show estimated new development potential on vacant land and underutilized industrial and commercial land under the General Plan Buildout Alternative. These estimates are based on acreage totals and allowable buildout within each applicable existing General Plan and zoning designation. To produce the estimates shown in Table 17.1, vacant land was identified based on the City's current map of existing land uses (Figure 4 in the Specific Plan), and development potential was estimated based on applicable zoning regulations. To produce the estimates shown in Table 17.2, underutilized land was identified based on opportunity areas identified in the Specific Plan (Figure 7), and development potential was estimated based on applicable zoning regulations. As shown in the tables, total maximum buildout (i.e., buildout on both vacant and underutilized land) allowed by the General Plan Buildout Alternative would be 935,425 square feet of employment generating land uses (i.e., commercial, retail and industrial uses). No residential development is allowable under current General Plan designations.

The General Plan Buildout Alternative may not meet project objectives related to revitalization of property around the downtown, as new development would be closely tied to market conditions. Many impacts would be generally similar to those identified for the proposed project, but without the mix of land uses and more efficient land use patterns that take advantage of the central city location. In addition, no residential development would be allowable.

17.2.2 Comparative Impacts and Mitigating Effects

(a) Land Use. Compared with the proposed project, the development on underutilized and vacant parcels and land use intensification on underutilized properties in the Specific Plan area would not occur or would be retarded or delayed under the General Plan Buildout Alternative. Some land in the Specific Plan area would continue to be underutilized and, in some cases, would remain vacant.

The General Plan Buildout Alternative would allow 935,425 square feet of employment-generating land uses, or approximately 2,060,000 fewer square feet than the 2,992,546 square feet allowed by the proposed project. Development anticipated under existing entitlements would therefore be generally less intense than that proposed under the Draft Specific Plan. Commercial and industrial land uses would be continued, and some increase and intensification of retail, commercial, and industrial uses would be expected to occur. No new residential development would be expected in Central Petaluma under the General Plan Buildout Alternative, as compared with 1,617 new housing units anticipated under the Draft Specific Plan.
### Table 17.1  General Plan Buildout Alternative- -Vacant Land Development Potential

<table>
<thead>
<tr>
<th>Zoning District</th>
<th>Maximum Site Coverage and Bldg. Heights</th>
<th>Acreage</th>
<th>Maximum Allowable Commercial and Industrial Development* (square feet)</th>
<th>Maximum Allowable Buildout with 25% Development Cap b</th>
</tr>
</thead>
<tbody>
<tr>
<td>RW (Riverfront Warehouse)</td>
<td>60%/3 stories</td>
<td>2.59</td>
<td>203100</td>
<td>50775</td>
</tr>
<tr>
<td>CH (Highway Commercial)</td>
<td>60%/2 stories</td>
<td>5.59</td>
<td>292200</td>
<td>73050</td>
</tr>
<tr>
<td>CC (Central Commercial)</td>
<td>100%/4 stories</td>
<td>11.53</td>
<td>2009000</td>
<td>502250</td>
</tr>
<tr>
<td>ML (Light Industrial)</td>
<td>60%/2 stories</td>
<td>4.98</td>
<td>260300</td>
<td>66075</td>
</tr>
<tr>
<td>PUD (Planned Unit District)</td>
<td>100%/4 stories</td>
<td>2.37</td>
<td>412950</td>
<td>103250</td>
</tr>
<tr>
<td><strong>Totals:</strong></td>
<td></td>
<td>27.1</td>
<td>3177550</td>
<td>794400</td>
</tr>
</tbody>
</table>


Notes:
- a- No residential development is allowed under current General Plan designations in the Specific Plan area.
- b- Maximum allowable buildout was calculated by multiplying acreage by maximum allowable lot coverage and building heights in each zoning district. For the RW and PUD districts, where no maximum lot coverage is defined, figures for maximum allowable lot coverage from adjacent districts were utilized.

### Table 17.2  General Plan Buildout Alternative--Underutilized Industrial and Commercial Land Development Potential

<table>
<thead>
<tr>
<th>Zoning District</th>
<th>Maximum Site Coverage and Bldg. Heights</th>
<th>Acreage</th>
<th>Maximum Allowable Commercial and Industrial Development* (square feet)</th>
<th>Maximum Allowable Buildout with 25% Development Cap b</th>
</tr>
</thead>
<tbody>
<tr>
<td>RW (Riverfront Warehouse)</td>
<td>60%/3 stories</td>
<td>1.93</td>
<td>151350</td>
<td>37850</td>
</tr>
<tr>
<td>CH (Highway Commercial)</td>
<td>60%/2 stories</td>
<td>0.3</td>
<td>15700</td>
<td>3925</td>
</tr>
<tr>
<td>ML (Light Industrial)</td>
<td>60%/2 stories</td>
<td>1.74</td>
<td>90950</td>
<td>22800</td>
</tr>
<tr>
<td>MG (Heavy Industrial)</td>
<td>60%/3 stories b</td>
<td>39.00c</td>
<td>305800</td>
<td>76450</td>
</tr>
<tr>
<td><strong>Totals:</strong></td>
<td></td>
<td>42.97</td>
<td>563800</td>
<td>141025</td>
</tr>
</tbody>
</table>


Notes:
- a- No residential development is allowed under current General Plan designations in the Specific Plan area.
- b- Allowable buildout was calculated using a maximum building height of 3 stories imposed when the MG district is adjacent to a residential district.
- c- Acreage total for the MG district assumes half of the 78-acre Pomeroy property is an underutilized, development opportunity area per Figure 7 of the Specific Plan.
The decrease in development over the proposed project would have associated reductions in the degree of related land use impacts, both positive and adverse. The General Plan Buildout Alternative may reduce impacts from new incompatible land uses, as well as potential growth-inducing effects from new commercial development. However, fewer existing land use compatibility problems would be remedied. New development would also occur more haphazardly without the aid of a unifying Specific Plan or newly revised area-specific development controls (i.e., smart code) to guide development in the Specific Plan area, which could result in additional land use impacts. This alternative would not create the more efficient land use patterns proposed in the Specific Plan, which take advantage of the central location of the planning area, its location near the historic downtown, the amenity of the river, and potential future transit stops.

(b) Population, Housing, and Employment. No housing is allowable under existing General Plan designations for the Specific Plan area. The General Plan Buildout Alternative would result in less improvement to the existing jobs/housing imbalance, compared with the proposed project. This alternative would produce less population and employment growth, compared to the growth rate expected with the project, resulting in a reduced level of associated traffic, noise and other impacts. However, the benefits of increased employment would also be reduced.

Compared with maximum anticipated buildout under current entitlements (General Plan Buildout Alternative), approximately 1,617 fewer housing units (no new housing) and approximately 2,060,000 square feet less of employment uses (commercial, retail and industrial) would be created than with buildout under the proposed Specific Plan.

(c) Transportation and Circulation. Under the General Plan Buildout Alternative significant unavoidable impacts on U.S. 101 would not be expected due to (1) less project trips generated within the Specific Plan area, and (2) the assumption that all planned roadway improvements contained in the General Plan (1987-2005) for the Specific Plan area and surrounding vicinity would be in place. However, significant impacts would be likely under the No Project Alternative at some study intersections identified within the Specific Plan area due to background growth that would occur elsewhere in Petaluma and the surrounding region based on historical trends and ABAG projections.

(d) Cultural and Historic Resources. Similar to the No Project Alternative, some potential impacts resulting from demolition of existing cultural and historic resources related to Specific Plan facilitated development would be avoided with the General Plan Buildout Alternative. However, some historic resource renovations that would potentially occur with the proposed Specific Plan may not occur under the General Plan Buildout Alternative.

(e) Public Services and Utilities. Proposed project-assisted public facilities improvements would not occur or would be more limited in the Specific Plan area under this alternative. As a
result, existing deficiencies would continue. On the other hand, this alternative would result in less demand for increased public services, since new development in the Specific Plan area would be reduced.

(f) **Visual Factors.** Compared with the proposed project, this alternative would produce fewer potential effects on valued visual resources in the Specific Plan area and other potential impacts on the visual environment, due to the reduced amount of new development. Compared with the proposed project, however, this alternative would result in fewer improvements to blighted visual environments from development of vacant and underutilized land in the Specific Plan area and implementation of streetscape improvements, especially on currently visually degraded streetscapes such as Washington Street.

Changes to the visual character of the Central Petaluma area under current entitlements would be minimal and would primarily focus on development of new retail uses in the Weller/Copeland Street area. Without the guidance of Specific Plan policies, this development would be expected to be more typical low-rise retail development with surface parking, rather than the more intensive mixed-use development envisioned in the Specific Plan. Due to lower overall development densities and a less diverse mix of land uses, general development would be more reflective of typical existing lower rise building prototypes, which would result in more land area dedicated to surface parking.

(g) **Noise.** Under this alternative, the construction-period noise impacts directly associated with anticipated development (e.g., roadway improvements, new building construction) in the Specific Plan area would be reduced. Potential noise impacts due to land use changes and increased traffic from new development would also be reduced, compared to the proposed project.

(h) **Air Quality.** This alternative would have construction-related air quality impacts similar to those of the proposed project but the frequency and duration of these impacts would be less due to the reduced amount of construction that would occur. This alternative would also have less impact on overall local carbon monoxide concentrations due to lower total trip generation, although impacts at individual intersections could be greater in some cases. Regional air quality impacts would be less than those of the proposed project, but would exceed the Bay Area Air Quality Management District (BAAQMD) thresholds of significance. Therefore, this alternative would result in a significant unavoidable impact on regional air quality.

(i) **Storm Drainage, Flood Control and Water Quality.** Compared with the proposed project, this alternative would result in fewer drainage system capacity, water quality, and localized flooding impacts due to the reduced amount of anticipated development. In addition, fewer structures would be introduced within the Petaluma River flood plain. However, the beneficial effects of project-facilitated storm drainage and flood control improvements would also be reduced.
(i) **Geology, Soils and Seismicity.** Impacts related to soils and seismicity would be less severe than those described for the proposed project due to reduced intensity of development under this alternative. However, potential benefits from retrofit and upgrade of existing buildings may be reduced due to the lower intensity and amount of development.

(k) **Hazardous Materials.** Since less development would occur under this alternative, fewer construction workers and new building occupants would be subject to hazardous materials exposure.

(l) **Biological Resources.** This alternative would result in fewer generalized impacts on vegetation and wildlife, compared with the proposed project. The potential for impacts on special status species habitats and jurisdictional wetlands would also be reduced. However, this alternative would eventually contribute to a greater overall loss of existing habitat due to the elimination of Specific Plan-proposed open space uses along the river on the undeveloped portion of the Pomeroy property. The band of open space proposed by the Specific Plan would complement the General Plan-designated open space use on McNear Peninsula, providing opportunities to enhance the wildlife habitat value of the river corridor. Under the General Plan Buildout Alternative, the current industrial use designation on the entire Pomeroy property would preclude these opportunities for habitat enhancement.

### 17.3 1999 DRAFT SPECIFIC PLAN ALTERNATIVE

#### 17.3.1 Principal Characteristics

This alternative represents adoption of a Specific Plan similar to the previously proposed project, the 1999 Draft Specific Plan, which provided for a greater variety of land use designations and a reduced amount of allowable development in the Specific Plan area as compared to the currently proposed Specific Plan. Table 17.3 shows estimated maximum net buildout potential under the 1999 Specific Plan, as outlined in Table 7 in the 1999 Specific Plan.

#### 17.3.2 Comparative Impacts and Mitigating Factors

As shown in Table 17.3, the total net buildout proposed under the 1999 Specific Plan (i.e., the 1999 Specific Plan Alternative compared to the No Project Alternative) would be:

- 425 net additional housing units
- 808,600 square feet additional office and retail (includes entertainment uses)
- 190,000 square foot *reduction* in general commercial/warehouse commercial uses

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### Table 17.3
1999 DRAFT SPECIFIC PLAN ALTERNATIVE--
NET DEVELOPMENT POTENTIAL (CHANGE FROM EXISTING CONDITIONS)

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Density sq. ft. assumptions</th>
<th>Total acres</th>
<th>Total units</th>
<th>Total square footage</th>
<th>Net Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>variable</td>
<td>--</td>
<td>425 du</td>
<td>--</td>
<td>425 d.u.</td>
</tr>
<tr>
<td>Office</td>
<td>variable</td>
<td>--</td>
<td>--</td>
<td>998,000</td>
<td>998,000</td>
</tr>
<tr>
<td>Retail</td>
<td>variable</td>
<td>--</td>
<td>--</td>
<td>(-315,000)</td>
<td></td>
</tr>
<tr>
<td>Hotel</td>
<td>1,000 sq. ft./room</td>
<td>--</td>
<td>80 rooms</td>
<td>80,000</td>
<td></td>
</tr>
<tr>
<td>Cinema</td>
<td>21.8 sq. ft./seat</td>
<td>--</td>
<td>2,000 seats</td>
<td>43,600</td>
<td>(-191,400) retail/hotel/cinema</td>
</tr>
<tr>
<td>General Comm./ Warehouse</td>
<td>FAR 0.35</td>
<td>--</td>
<td>--</td>
<td>(-190,000)</td>
<td>(-190,000)</td>
</tr>
<tr>
<td>Industrial</td>
<td>60% coverage/3 stories (-30)</td>
<td>--</td>
<td>--</td>
<td>(-2,352,240)</td>
<td>(-2,352,240)</td>
</tr>
</tbody>
</table>

**SOURCE:** Draft Central Petaluma Specific Plan, 1999.

**Notes:**
- du=dwelling unit
- ac=acre
- sf=square feet
- FAR= Floor Area Ratio
Because development of this alternative would involve a lower intensity of development than the proposed project, the comparison of impacts and mitigating factors would be similar to those outlined for the General Plan Buildout Alternative described in subsection 17.2.2 above. However, the severity of the impacts would be less than those described for the General Plan Buildout Alternative, since development that would occur under current entitlements (i.e., the General Plan Buildout Alternative) would result in a greater intensity of development than under the 1999 Specific Plan. In terms of traffic, this alternative would result in traffic impacts similar to or less than the General Plan Alternative. Significant unavoidable impacts on U.S. 101 would not be expected due to less project trips generated within the 1999 Specific Plan area than for the 2002 Specific Plan Alternative. However, significant impacts to some study intersections would be likely under the 1999 Specific Plan Alternative due to land use changes envisioned by the 1999 Specific Plan (similar to or less than the General Plan) and background growth that would occur elsewhere in Petaluma and the surrounding vicinity, similar to the General Plan Alternative. Like the General Plan Buildout Alternative, the 1999 Specific Plan Alternative would not help create as many jobs or housing units as the proposed project.

17.4 MITIGATED PROJECT ALTERNATIVE

17.4.1 Principal Characteristics

The Mitigated Project Alternative would be the same as the proposed project (as described in section 3 of this EIR), except that this alternative would incorporate the mitigation measures recommended in sections 4 through 15 of this EIR relating to land use; population, housing, and employment; transportation and circulation; cultural and historic resources; visual factors; noise; air quality; storm drainage, flood control, and water quality; geology, soils, and seismicity; and biological resources.

17.4.2 Comparative Impacts and Mitigating Effects

(a) Land Use. This alternative would reduce the potential land use compatibility impacts described in section 4 of this EIR to less-than-significant levels.

(b) Population, Housing, and Employment. Similar to the proposed project, this alternative would not result in any adverse population, housing, or employment impacts. In addition, the Mitigated Project Alternative would incorporate an affordable housing component not currently required in the proposed Specific Plan.

(c) Transportation and Parking. This alternative would reduce the adverse traffic impacts identified in section 6 of this EIR to less-than-significant levels (because improvements recommended to mitigate these impacts would be directly incorporated within the Specific Plan program). However, significant unavoidable traffic impacts would remain significant and unavoidable, since there is no mitigation available to reduce these impacts to less-than-significant levels.
(d) Cultural and Historic Resources. This alternative would incorporate measures identified in this EIR to reduce impacts on archaeological and historic resources to less-than-significant levels.

(e) Public Services and Utilities. No significant impacts on public services and utilities were identified for the proposed Specific Plan, and therefore, the Mitigated Project Alternative would have no significant impacts on these services and utilities.

(f) Visual Factors. This alternative would reduce the project-related impacts on visual factors to less-than-significant levels.

(g) Noise. This alternative would reduce identified long-term noise impacts to insignificant levels through the incorporation of EIR-identified noise design measures and performance standards. The EIR-recommended procedures for reducing construction noise impacts associated with project-facilitated activities would also reduce these impacts to less-than-significant levels.

(h) Air Quality. This alternative would incorporate measures to reduce construction-period air quality impacts into the conditions of approval for all project-facilitated developments, thereby reducing related air quality impacts to less-than-significant levels. Carbon monoxide and regional air quality impacts would be reduced through implementation of Transportation Systems Management (TSM) programs and land use/site planning measures described in chapter 11 (Air Quality) of this EIR. However, regional air quality impacts due to project traffic would remain significant and unavoidable, since there is no mitigation available to reduce these impacts to less-than-significant levels.

(i) Storm Drainage, Water Quality and Flooding. This alternative would also reduce the drainage, flooding, and water quality impacts identified for the project to less-than-significant levels.

(j) Geology, Soils, and Seismicity. This alternative would reduce the geotechnical impacts identified for the project to less-than-significant levels.

(k) Hazardous Materials. Similar to the proposed project, this alternative would not result in any adverse hazardous materials and waste impacts, provided that standard development review and remediation procedures are followed as described in chapter 14 (Hazardous Materials) of this EIR.

(l) Biological Resources. This alternative would reduce project impacts on vegetation and wildlife, including identified significant adverse impacts on river edge habitats and wetlands, and potential special status plant species habitats, to less-than-significant levels through incorporation of the future, project-specific habitat avoidance and management measures identified in this EIR. In addition, no impacts on heritage trees would occur with this alternative. The Specific Plan-proposed band of open space on the Pomeroy property would
complement the General Plan-designated open space use on McNear Peninsula, providing opportunities to enhance the wildlife habitat value of the river corridor.

17.5 ALTERNATIVES CONSIDERED BUT REJECTED

Two alternatives were considered but rejected because of infeasibility or not attaining City goals for the Specific Plan project. One alternative would be to adopt the Specific Plan as proposed, but without the 25 percent development cap. Although this alternative would create more housing and jobs, it would not lessen any of the project impacts, and would increase their severity in most cases. Therefore, this alternative was not considered further.

An offsite or alternative location alternative was also considered but rejected. CEQA requires that an alternative location be identified if any of the significant effects of a project could be avoided or substantially reduced by developing the project in another location. If the lead agency determines that no feasible alternative location exists, it must disclose the reasons for this conclusion.

The City of Petaluma, as the lead agency under CEQA, has determined that an offsite location for this project is not feasible and need not be discussed in this EIR, based on the following reasons: (1) City policy encourages economic revitalization within its Redevelopment Specific Plan areas, which overlap with the Specific Plan area; and (2) the project is inseparably tied to this location. Adopting a Specific Plan for another location would not meet project objectives calling for revitalization of property around the downtown, Turning Basin and Petaluma Depot. On the basis of these considerations, the City of Petaluma has determined that analysis of the environmental impacts associated with implementation of the proposed project at a different location is not necessary.

17.6 CONCLUSIONS

This EIR section has described a range of reasonable alternatives to the proposed action that could attain the basic objectives of the project, and has described the comparative environmental advantages and disadvantages of these alternatives. The descriptions and comparative evaluations were developed by the EIR authors based on the impact and mitigation findings in sections 4 through 15 of this report.

CEQA Guidelines call for identification of the environmentally superior alternative other than the No Project Alternative. Based on the comparative analysis results described above, it has been determined that the "Mitigated Project Alternative" would result in the least adverse combination of environmental impacts and would therefore be the "environmentally superior" alternative.
18. CEQA-REQUIRED ASSESSMENT CONCLUSIONS

This chapter summarizes the EIR in terms of the various assessment categories suggested by California Environmental Quality Act (CEQA) guidelines for EIR content. The chapter includes report findings with respect to "growth inducement," "unavoidable significant adverse impacts," "irreversible environmental changes," "cumulative impacts," and "effects found not to be significant."

18.1 GROWTH-INDUCING IMPACTS

Section 21100(g) of CEQA requires that an EIR include information regarding the growth-inducing impact of the proposed project. Section 15126(g) of the CEQA Guidelines states that the discussion should include the "...ways in which the proposed project could foster economic or population growth, or the construction of additional housing either directly or indirectly, in the surrounding environment."

Growth inducement associated with increased economic activity and investment is an inherent impact (i.e., a goal) of the proposed Specific Plan. If project objectives are successfully achieved, new development activities are expected to occur, including an increased intensity of commercial, residential, industrial and mixed-use development in the Specific Plan area. This EIR conservatively assumes that proposed project assistance actions may result in realization of Specific Plan area development levels consistent with the proposed Specific Plan residential and commercial development "caps" (see Table 3.1 herein).

18.1.1 Internal Growth-Inducement

If the Specific Plan does facilitate development as anticipated in this EIR, the growth effects up to the following levels can be anticipated, as described in Chapter 4 (Land Use) and Chapter 5 of this EIR (Population, Housing and Employment):

- the number of households in the Specific Plan area could increase by an estimated 1,617 households by the year 2020;
- the population in the Specific Plan area could increase by 4,444 people by the year 2020;
- the number of jobs in the Specific Plan area could increase by an estimated 5,985 jobs by the year 2020; and
18.1.2 External Growth-Inducement

The primary growth-inducing impacts of the project would be confined within the boundaries of the Specific Plan area. In particular, project-induced increases in local primary ("basic") jobs could be expected to have a "multiplier" effect, increasing overall employment totals and housing demands in the City and the surrounding area. To a lesser degree, secondary growth-inducing impacts (the "multiplier" effect) could also be expected in portions of the city outside the Specific Plan area boundary. Project-facilitated infrastructure improvements, and some of the development projects that would be facilitated within the Specific Plan area, might induce additional pressure to intensify use of surrounding underused lands. Most of this primary and secondary growth inducement would be expected to occur in a manner consistent with the Petaluma General Plan.

Secondary growth-inducing land use impacts of the project would occur in the form of future individual development proposals and associated applications. Each such future project, with the exception of those which are exempt from CEQA, would require applicant submittal and City of Petaluma review of associated individual development applications, and under CEQA, would routinely involve project-specific environmental impact documentation and public review to ensure that any associated significant adverse impacts are adequately addressed. These requirements and procedures would be expected to reduce such secondary growth-inducement impacts of the project to less-than-significant levels, unless specific statements of overriding consideration were adopted.

18.2 UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

Section 21100(b) of CEQA requires that the EIR discuss "any significant environmental effects which cannot be avoided if the project is implemented." Unavoidable adverse impacts are those that could not be reduced to less-than-significant levels by the mitigation measures recommended in this report. Significant unavoidable impacts identified were identified in this EIR related to Air Quality, Transportation and Historic Resources.

18.3 IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 21100(f) of CEQA requires that an EIR identify any significant irreversible changes that would result from implementation of the project. The project is a series of actions, improvements and development that would further urbanization within the Specific Plan area. Due to the scale of the proposed project and the commitment of resources involved in its
implementation, the impacts of the project would be considered "irreversible environmental changes." The future removal of Specific Plan-facilitated urban changes, and associated impact reversals, would be highly unlikely, and therefore can be considered "irreversible."

18.4 CUMULATIVE IMPACTS

The CEQA Guidelines (section 15355) define "cumulative impacts" as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." In the case of the proposed Specific Plan, cumulative impacts could result from the Specific Plan impacts in combination with other recently approved and pending development in Petaluma or elsewhere in Sonoma County. The cumulative effects of the Specific Plan and surrounding development on land use, population, employment and housing, transportation, public services and utilities, storm drainage, flood control and water quality, noise, air quality, and biological resources have been fully considered and are discussed where applicable in sections 4 through 15 of this EIR.

18.5 EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of Petaluma, in its Initial Study for the proposed Specific Plan, determined that a number of specific possible environmental effects would not occur, would be insignificant, or would be adequately addressed in subsequent City development review procedures without further environmental assessment in this program EIR. These environmental impact categories (i.e., mineral resources and agricultural resources) are identified in Appendix 21.2 of this EIR, which contains the Initial Study Checklist and narrative.
19. MITIGATION MONITORING

This chapter of the EIR describes a recommended monitoring program for implementation of the mitigation measures identified in this EIR, and describes relationships between various anticipated monitoring needs and responsible monitoring agencies.

19.1 BACKGROUND

CEQA Section 21081.6 of the Public Resources Code requires all public agencies to adopt reporting or monitoring programs when they approve projects subject to environmental impact reports or mitigated negative declarations.

A mitigation monitoring program would be required for implementation subsequent to certification of the Central Petaluma Specific Plan EIR. Most of the environmental mitigation measures which have been recommended in this EIR would be subject to effective monitoring through normal City of Petaluma and Petaluma Community Development Commission Specific Plan adoption and subsequent development approval, building permit, and associated plan check and field inspection procedures. However, to satisfy CEQA Section 21081.6, a documented record of implementation will be necessary.

19.2 MONITORING CHECKLIST

While actual formulation of a specific mitigation monitoring program should not be completed until the Final EIR is completed, the relationship between the various mitigation measures in this EIR and the responsible monitoring agency, and the framework to be followed in finalizing the monitoring program, can be determined on a preliminary basis at this time. This preliminary information can also assist decision-makers in evaluating the potential feasibility and effectiveness of the various mitigations recommended herein.

The attached checklist (Table 19.1) includes spaces for identifying: (1) each impact and associated mitigation measure included in the EIR, (2) the party responsible for implementing that mitigation measure, (3) the type of monitoring required, (4) the timing of the implementation, and (5) the party responsible for performing the mitigation monitoring. These checklist categories are discussed in more detail below.
19.2.1 Identified Impact

This column would include each identified significant adverse impact as it is described in the EIR summary table (EIR section 2).

19.2.2 Mitigation Measures (Performance Criteria)

This column would include each mitigation measure as it is described in the EIR summary table (EIR section 2). The description could be supplemented by any applicable performance criteria (i.e., the measure by which the success of the mitigation can be gauged) associated with each measure.

19.2.3 Monitoring

This column would describe (1) the "implementation entity" responsible for carrying out each mitigation measure (e.g., the City, a City department, another public agency, etc.); (2) the "type of monitoring action" required (e.g., established plan check and/or inspection procedures or, if these are not sufficient, specialized monitoring procedures by hired professionals); (3) specific implementation timing requirements (e.g., at the completion of a particular development review or construction phase, prior to occupancy of individual projects, or when some specific threshold is reached); and (4) the "monitoring and verification entity" responsible for performing the monitoring of each mitigation (e.g., a professional specialist hired by the City, a City department, or other public agency).

19.2.4 Verification

The Verification column would provide a space for the signature and date of the "monitoring and verification" entity when a monitoring milestone is completed.
Table 19.1
MITIGATION MONITORING CHECKLIST--CENTRAL AREA SPECIFIC PLAN

The environmental mitigation measures listed in column two below have been incorporated into the conditions of approval for the Draft Central Petaluma Specific Plan in order to mitigate identified environmental impacts. A completed and signed chart will indicate that each mitigation requirement has been complied with, and that City and state monitoring requirements have been fulfilled with respect to Public Resources Code Section 21081.6.

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<th>IDENTIFIED IMPACT</th>
<th>RELATED MITIGATION MEASURE (CONDITION OF APPROVAL)</th>
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20. ORGANIZATIONS AND PERSONS CONTACTED

20.1 CITY OF PETALUMA

Michael Moore, Community Development Director
Lt. Mike Cook, Petaluma Police Department
Chris Albertson, Fire Chief, Petaluma Fire Department
Mike Bonn, Petaluma Water Resources Department
Trae Cooper, GIS Specialist, City Manager's Office

20.2 OTHERS

Donna Caldwell, Waste Management Specialist, Sonoma County Public Works Department, Refuse Division
Chris Murray, Sonoma County Water Agency
21. APPENDICES

21.1 Program EIR Authority
21.2 Notice of Preparation and Initial Study Checklist
21.3 CEQA Standards for EIR Adequacy
21.4 CEQA Definition of "Mitigation"
21.5 Supplementary Traffic Figures
21.6 EIR Consultant Team
APPENDIX 21.1: PROGRAM EIR AUTHORITY (CEQA SECTION 15168)

This EIR for the proposed Central Petaluma Specific Plan has been prepared as a program EIR under authority of section 15168 of the CEQA Guidelines. Section 15168 explains that a program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in the chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The proposed Specific Plan, and the series of actions required for its implementation, are characterized by all four of these relationships. One, they are geographically related because the project, including all of its implementing actions, would occur in the same general area within the City of Petaluma. Two, the various local, state, and federal governmental approvals, entitlements, and permits that may be required for development of the project are all logical parts in the chain of actions contemplated by the Specific Plan. Three, development and redevelopment of the Specific Plan area would be undertaken in connection with the issuance of rules, regulations, plans, and other general criteria set forth in the Specific Plan. Four, activities under the Specific Plan would be comprised of various individual activities carried out under the statutory authority of the City of Petaluma that would generally have similar environmental effects that could be mitigated in similar ways.

Use of a program EIR can provide the following advantages. The program EIR can: (1) provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action; (2) ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis; (3) avoid duplicative reconsideration of basic policy considerations; (4) allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts; and (5) allow reduction in paperwork.

Subsequent development activities must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. If the lead agency finds that pursuant to section 15162, no new effects could occur or no new mitigation measures would be required, the lead agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Under CEQA section 15168, a lead agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the
program. Where the subsequent activities involve site-specific operations, the lead agency
should use a written checklist or similar device to document the evaluation of the site and the
activity to determine whether the environmental effects of the operation were covered in the
program EIR.

A program EIR will be most helpful in dealing with subsequent activities if it deals with the
effects of the program as specifically and comprehensively as possible. With a good and
detailed analysis of the program, many subsequent activities can be found to be within the
scope of the project described in the program EIR, and no further environmental documents
would be required.

A program EIR can be used to simplify the task of preparing environmental documents on later
parts of the program. The program EIR can: (1) provide the basis in an Initial Study for
determining whether the later activity may have any significant effects; (2) be incorporated by
reference to deal with regional influences, secondary effects, cumulative impacts, broad
alternatives, and other factors that apply to the program as a whole; and (3) focus an EIR on a
subsequent project to permit discussion solely of new effects which had not been considered
before.
APPENDIX 21.2:

NOTICE OF PREPARATION AND INITIAL STUDY CHECKLIST
NOTICE OF PREPARATION

Date: November 6, 2002

To: Responsible Agencies, Trustee Agencies, and Other Interested Parties (see distribution list)

Subject: Notice of Preparation of an Environmental Impact Report for the Central Petaluma Specific Plan

From: Mike Moore, Community Development Director
City of Petaluma

The City of Petaluma is preparing an environmental impact report (EIR) for the Draft Central Petaluma Specific Plan. The proposed Central Petaluma Specific Plan area encompasses nearly 400 acres within the heart of the city. The Specific Plan area is roughly bounded by Lakeville Street on the north and northeast, Petaluma Blvd. and the Petaluma River on the west and south, and U.S. Highway 101 on the east. The proposed Specific Plan (the “project”) and anticipated EIR scope are described in more detail in the attached Initial Study.

The City of Petaluma will be the lead agency for the project and has prepared this Notice of Preparation (NOP) pursuant to Section 15082 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of the NOP is to inform interested agencies and the general public that an EIR is being prepared for this project and to invite specific comments on the scope and content of the EIR.

Please send your response to:

Community Development Department
City of Petaluma
11 English Street
Petaluma, CA 94952-2610
Attn: Mike Moore, Director of Community Development
**Introduction:** This Initial Study has been prepared pursuant to the California Environmental Quality Act (Public Resources Code, Section 21000 et seq) and associated CEQA Guidelines.

**Project Name:** Draft Central Petaluma Specific Plan

**Site Address:** See attached boundary map (Exhibit A)

**Lead Agency Contact:** Mike Moore, Community Development Director

**Applicant:** City of Petaluma

**Project Description:** The Central Petaluma 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 Specific Plan provides for a mixture 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.

The proposed Specific Plan area encompasses nearly 400 acres within the heart of the city, as shown in Exhibit A. The proposed Specific Plan area is roughly bounded by Lakeville Street on the north and northeast, Petaluma Blvd. and the Petaluma River on the south and west, and U.S. Highway 101 on the east. A large portion of the proposed Specific Plan area overlaps with the Petaluma Redevelopment Plan area.

**Environmental Setting:** The proposed Specific Plan area is urbanized and includes developed, underutilized, and vacant properties, with a mix of retail, office, service commercial, single and multi-family residential, heavy commercial, and industrial uses.

**Responsible/Trustee Agencies:** (Discuss other permits, financing or participation required):

The proposed Specific Plan will require approval of the City of Petaluma Planning Commission and City Council. No other public agency approval is required.
### Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

|--------------------------|--------------------------------------|----------------------|--------|-------------------------------|---------------------------|----------|-------------------------------|-------------------------------|-------------------------------|----------------|----------------|-------------------------------|----------------|----------------|----------------|----------------|----------------|
Determination

I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION should be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find the proposed project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment because all potentially significant effects a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION including revisions or mitigation measures that are imposed upon the proposed project nothing further is required.

Prepared by: Michael C. Moore
Name
Community Development Director
Title

Signature Date
Environmental Analysis

1. **Land Use and Planning.** Would the project:

   a. Physically divide an established community?
   b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
   c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

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**Discussion:** Implementation of Specific Plan elements could lead to an intensification of development within the Central Petaluma area. This in turn could have an impact on the area’s land use character, and on land use compatibilities within and adjacent to the area. These land use effects could in turn possibly conflict with policies set forth in the City’s adopted General Plan, Petaluma River Access and Enhancement Plan, and zoning ordinance, as well as the applicable plans, policies or regulations of such regional agencies as the Bay Area Air Quality Management District and the San Francisco Bay Regional Water Quality Control Board.

2. **Population, Employment and Housing.** Would the project:

   a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
   b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
   c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

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**Discussion:** One of the goals of the Central Petaluma Specific Plan (Specific Plan) and the Petaluma Redevelopment Plan (which overlaps with the Specific Plan area) is to encourage specific types of economic growth, land use intensification, and housing development within the central area. Such growth would be seen as a beneficial effect of the project. However, such growth could also exceed current population, housing and/or employment projections for the central area. The Draft Specific Plan allows for development of up to just under 3 million square feet of commercial space and 1,617 new housing units within the entire Specific Plan area.
3. **Geology and Soils.** Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction?

b. Result in substantial soil erosion or the loss of topsoil?

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

e. Unstable earth conditions or changes in geologic substructures?

f. Disruptions, displacements, compaction or overcovering of the soil?

g. Change in topography or ground surface relief features?

h. The destruction, covering or modification of any unique geologic or physical features?

i. Any increase in wind or water erosion of soils, either on or off site?

j. Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?

k. Exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure or similar hazards?

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**Discussion:** The proposed project area is located roughly four miles west of the Rodgers Creek fault. Intensification of land uses within the proposed project area boundaries may leave properties susceptible to the effects of seismic activity (ground-shaking, ground failure, liquefaction, etc.). Portions of the project area may be located on fill or other liquefaction and/or subsidence prone soils. Disruptions, compacting and overcovering of the soil are likely as a result of plan-facilitated development within the project area. Plan-facilitated development may also generate construction period soil erosion, with potential impacts on Petaluma River water quality.

4. **Air.** Where available, the significance of criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?
### Potential Significant Impact

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### Discussion:
Plan-facilitated intensification of land use within the project area and associated increases in motor vehicle traffic and traffic congestion could contribute to the deterioration of local and regional air quality. Implementation of proposed Specific Plan recommended improvements to transit and bicycle and pedestrian access could help offset these impacts. Construction activities could lead to temporary air quality impacts and have an effect on sensitive receptors.

5. **Hydrology and Water Quality.** Would the project:

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a. Violate any water quality standards or waste discharge requirements?

b. 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 level (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)?

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river in a manner which would result in substantial erosion or siltation on- or off-site?

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

f. Otherwise substantially degrade water quality?

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
j. Inundation by seiche, tsunami or mudflow?

Discussion: Portions of the project area are located within the Petaluma River related 100-year flood plain and development within the project area could be susceptible to 100-year floods. Additional urban runoff due to plan-facilitated development could lead to reduced water quality. Associated filling of properties within the 100-year flood plain may displace flood waters and affect adjacent properties.

6. **Biological Resources.** Would the project:

   a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

   b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

   c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

   d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

   e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

   f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan?

Discussion: The project area has been developed with urban uses; however, a portion of the Petaluma River runs through the project area and contains riparian and wetlands habitat that may be affected by plan-facilitated development in the project area.

7. **Noise.** Would the project result in:

   a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

   b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

   c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

   d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

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f. For a project within the vicinity of a private airstrip would the project expose people residing or working in the project area to excessive noise levels?

Discussion: Plan-facilitated intensification of development within the project area and associated motor vehicle traffic increases may result in an increase in ambient noise levels above existing levels. The increase in development facilitated by the Specific Plan could also result in more people being exposed to increased noise levels associated with traffic arterials and with temporary construction activities.

8. Visual Quality and Aesthetics. Would the project:
   a. Have a substantial adverse effect on a scenic vista?
   b. Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
   c. Substantially degrade the existing visual character or quality of the site and its surroundings?
   d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

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Discussion: Various elements of the Specific Plan may have beneficial and/or adverse impacts on the existing visual quality of the area. Project-facilitated development and change could significantly affect the visual character of the Central Area, and could result in location-specific visual incompatibilities. Existing and proposed residential and other uses in the central area could experience significant light and glare impacts associated with a general increase in area lighting.

9. Hazards & Hazardous Materials. Would the project:
   a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
   b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
   c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
   d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
   e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

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### Discussion:
Plan-facilitated new commercial or industrial uses could involve the routine transport, use, or disposal of hazardous materials. Plan-facilitated demolition or construction activity could result in construction period or post-construction period exposures to hazardous building materials (asbestos, lead, etc.) or to soils or groundwater contaminated by previous uses.

### Transportation/Traffic
Would the project:

| f. | For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? |  |  | X |
| g. | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? |  |  | X |
| h. |Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? |  |  | X |

**Discussion:** Plan-facilitated intensification of various land uses within the project area may result in increased vehicle trips and parking demands within and adjacent to the project area. The Draft Specific Plan contains policies related to the development of structured parking in the project area, which could counterbalance the effects of increased parking demand.

### Public Services
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection?

|  |  |  |  | X |
### Potential Significant Impact

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- Police protection?    
- Schools?             
- Parks?               
- Other public facilities?

**Discussion:** Plan-facilitated intensification of land uses within the project area could affect local police service and fire protection demands and result in a higher demand for other municipal services. In particular, proposed increases in residential densities and the number of dwelling units within the project area could result in increased demands and impacts on local schools, libraries, etc. Portions of the local road system, storm drain system and sewer and water systems could be affected by plan-facilitated intensification of development due to their age, size and configuration.

#### 12. Recreation

**a.** Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**b.** Does the project include recreational facilities or require the construction or expansion on recreational facilities which might have an adverse physical effect on the environment?

**Discussion:** Plan-facilitated development intensification within the project area may result in increased demands for local park and recreation facilities. Improvements to park and recreational facilities are identified in the Draft Specific Plan to offset the anticipated effects of these increased demands.

#### 13. Utilities and Infrastructure

**a.** Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

**b.** Require or result in the construction of a new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

**c.** Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

**d.** Have sufficient water supplies available to serve the project from existing entitlements needed?

**e.** Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

**f.** Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

**g.** Comply with federal, state, and local statutes and regulations related to solid waste?

**Discussion:** Intensification of land uses within the project area could increase the amount of impervious surfaces and may require expansion of existing storm drainage facilities and increase the demand for sewer and water services, and solid waste disposal services.
14. **Mineral Resources.** Would the project:
   a. Result in the loss or availability of a known mineral resource that would be of value to the region and the residents or the state?
   b. Result in the loss of availability of a locally-important mineral resource recovery size delineated on a local general plan, specific plan or other land use plan?

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**Discussion:** The project area is predominantly urbanized and contains no known mineral resources.

15. **Cultural Resources.** Would the project:
   a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
   b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
   c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
   d. Disturb any human remains, including those interred outside of formal cemeteries?

| X                           |                                               |                               |           |
| X                           |                                               |                               |           |
|                               |                                               |                               |           |
|                               |                                               |                               |           |

**Discussion:** Intensification of land uses within the project area may have an impact on identified historic resources. A historic resources inventory was completed as part of the Specific Plan process and aided in development of Specific Plan policies relative to historic resources. There is also the potential that development activities could affect as-yet-unknown (unrecorded) archaeological or cultural resources within the project area.

16. **Agricultural Resources.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:
   a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
   b. Conflict with existing zoning for agricultural use or a Williamson Act contract?
   c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

| X                           |                                               |                               |           |
|                               |                                               |                               |           |
|                               |                                               |                               |           |

**Discussion:** The project area is mostly urbanized and does not contain any significant agricultural land.
17. **Mandatory Findings of Significance.**

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<td>d.</td>
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I, ________________________, the project applicant, have reviewed this Initial Study and hereby agree to incorporate the mitigation measures and monitoring programs identified herein into the project.

Signature of Applicant ______________________ Date ______________________
CENTRAL PETALUMA SPECIFIC PLAN AREA

Source: City of Petaluma, 2002

Exhibit A

Wagstaff and Associates • Urban and Environmental Planners

Central Petaluma Specific Plan EIR • Petaluma Community Development Commission
APPENDIX 21.3:
CEQA STANDARDS FOR EIR ADEQUACY

According to Section 15151 of the CEQA Guidelines, the standards for Adequacy of an EIR are as follows:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.
APPENDIX 21.4:

CEQA DEFINITION OF "MITIGATION"

According to Section 15370 of the CEQA EIR Guidelines, the term "mitigation" includes:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree of magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impacts by replacing or providing substitute resources or environments.
APPENDIX 21.5

SUPPLEMENTARY TRAFFIC FIGURES
### Existing Conditions

<table>
<thead>
<tr>
<th>Figure 3</th>
<th>AM Peak Hour Traffic Volumes and Lane Configurations</th>
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<tr>
<td>1. U.S. 101 NB Ramps / Redwood Hwy</td>
<td>![Diagram E 74.9]</td>
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<tr>
<td>2. U.S. 101 SB Ramps / Redwood Hwy</td>
<td>![Diagram D 37.4]</td>
</tr>
<tr>
<td>3. U.S. 101 NB Ramps / E. Washington St</td>
<td>![Diagram C 34.0]</td>
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<tr>
<td>4. U.S. 101 NB Ramps / E. Washington St</td>
<td>![Diagram D 47.2]</td>
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<td>5. U.S. 101 SB Ramps / E. Washington St</td>
<td>![Diagram C 29.3]</td>
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<tr>
<td>6. Lakeville St / Lindberg Ln</td>
<td>![Diagram F &gt;80.0]</td>
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<tr>
<td>7. Lakeville St / Caulfield Ln</td>
<td>![Diagram D 47.6]</td>
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<tr>
<td>8. Lakeville St / U.S. 101 SB Ramps</td>
<td>![Diagram D 54.9]</td>
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<tr>
<td>9. Lakeville St / U.S. 101 NB Ramps</td>
<td>![Diagram F &gt;80.0]</td>
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<tr>
<td>10. Lakeville St (Hwy 116) / Baywood Dr</td>
<td>![Diagram D 47.6]</td>
</tr>
<tr>
<td>11. Petaluma Blvd / Lakeville St</td>
<td>![Diagram D 54.9]</td>
</tr>
<tr>
<td>12. E. Washington St / Lakeville St</td>
<td>![Diagram D 54.9]</td>
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<tr>
<td>13. D St / Lakeville St</td>
<td>![Diagram D 54.9]</td>
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**Legend:**
-  = Signalized Intersection
-  = Stop Sign
-  = Turning Movement
XX = PM Peak Hour Traffic Volumes
C20.4 = LOS Delay (veh/sec)

Shaded boxes indicate intersections operating below the City's current level of service policy.
LEGEND:

- Signalized intersection
- Stop Sign
- Turning Movement

XX = PM Peak Hour Traffic Volumes

C 29.4 = LOS Delay (veh/sec)

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

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

February 2003
1027-0081/acadgraphics/0081-01 fg 9
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

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

FIGURE 11
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

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

FIGURE 12
1. U.S. 101 NB Ramps / Redwood Hwy
2. U.S. 101 SB Ramps / Redwood Hwy
3. U.S. 101 NB Ramps / E. Washington St
4. U.S. 101 SB 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

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

FIGURE 13
APPENDIX 21.6  EIR CONSULTANT TEAM

CITY OF PETALUMA

Michael Moore, Community Development Director

CENTRAL PETALUMA SPECIFIC PLAN AND EIR CONSULTANTS

Vincent Smith, AICP, Contract Planner
Bonnie Fisher, ROMA Design Group
Hushashi Sugaya, Carey & Co. Architecture (Historic Resources Consultants)
Matthew Ridgway, Project Manager, Fehr & Peers, Associates (Transportation and Parking Consultants)
Michelle Tobias, Transportation Specialist, Fehr & Peers Associates

WAGSTAFF AND ASSOCIATES

Urban and Environmental Planners; Prime Contractor

John Wagstaff, Principal-in-Charge
Vanessa Bulkacz, Project Manager
Ray Pendro, Senior Planner
Steve Ridone
Toni Fricke

DON BALLANTI

Certified Consulting Meteorologist
Air Quality Analysis

SIXTH STREET STUDIO

Graphics
Valerie Reichert, Project Manager