

Resolution No. 2014-126 N.C.S.  
of the City of Petaluma, California

**MAKING FINDINGS OF FACT AND ADOPTING A MITIGATION  
MONITORING AND REPORTING PROGRAM FOR THE  
RIVERFRONT MIXED USE DEVELOPMENT PURSUANT TO  
THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

**WHEREAS**, Basin Street Properties (“Applicant”) proposes a mixed-use development consisting of up to 273 residential units, up to 90,000 sf of commercial uses, a 120-room hotel, approximately 4 acres of parks and an approximately 3.8-acre offsite riverfront park on adjacent state-owned property along the Petaluma River; and,

**WHEREAS**, the project applications submitted by the Applicant include a zoning map amendment and a tentative subdivision map to create 144 lots on 35.7 acres, and the applications collectively comprise the “Project”; and,

**WHEREAS**, an Initial Study and Notice of Preparation of the Draft Environmental Impact Report was prepared and circulated to all responsible and affected agencies for consultation on the scope of the EIR , pursuant to Public Resources Code Section 21080.4 and California Environmental Quality Act (“CEQA”) Guidelines Section 15082; and,

**WHEREAS**, based on the Initial Study, the Scoping Meeting, and responses to the Notice of Preparation, the City prepared a Draft EIR dated December 2013 (SCH No. 2013062004) which reflected the independent judgment of the City as to the potential environmental effects of the Project; and,

**WHEREAS**, the Notice of Availability for the Draft EIR was published in the Argus Courier on December 12, 2013, and mailed to residents and occupants within 1,000 feet of the site, exceeding CEQA’s notice requirements, and the Draft EIR was circulated for the required 45 day public review period, from December 19, 2013 to February 6, 2014; and,

**WHEREAS**, the Draft EIR relies on the EIR for the City of Petaluma General Plan 2025, certified by City Council Resolution 2008-058 N.C.S. on April 7, 2008 and the Central Petaluma Specific Plan (CPSP) adopted June 2, 2003 and amended July 1, 2013, for information and analysis relating to certain cumulative impacts and incorporates said analysis and conclusions to the extent applicable, as identified in the Draft EIR; and,

**WHEREAS**, the City has committed to implementing the mitigation measures contained in the Implementation Plan and Mitigation Monitoring and Reporting Program adopted by the City as Exhibit B to Resolution 2008-084N.C.S., Resolution of the City Council of the City of Petaluma Making Findings of Fact, Adopting a Statement of Overriding Considerations, and Adopting an Implementation and Mitigation Monitoring and Reporting Program in support of the General Plan 2025, pursuant to the California Environmental Quality Act; and,

**WHEREAS**, the City has committed to implementing the mitigation measures contained in the Mitigation Monitoring and Reporting Program adopted by the City as Exhibit A to Resolution 2003-104 N.C.S., Resolution of the City Council of the City of Petaluma Making

Findings of Fact, Adopting a Statement of Overriding Considerations, and Adopting an Implementation and Mitigation Monitoring and Reporting Program in support of the Central Petaluma Specific Plan, pursuant to the California Environmental Quality Act; and,

**WHEREAS**, the City distributed copies of the Draft EIR in conformance with CEQA to the public agencies which have jurisdiction by law with respect to the project and to other interested persons and agencies and sought the comments of such persons and agencies; and,

**WHEREAS**, the Planning Commission held a public hearing on January 14, 2014 to consider the Draft EIR; and,

**WHEREAS**, the City Council held a public hearing on February 3, 2014 to consider the Draft EIR; and,

**WHEREAS**, responses to written and oral comments received the Draft EIR have been prepared in the form of a Final Environmental Impact Report for the Project (“Final EIR”); and,

**WHEREAS**, the Planning Commission held a noticed public meeting on June 24, 2014, at which time it considered the Final EIR and accepted public testimony; and,

**WHEREAS**, the City Council held a noticed public meeting on July 21, 2014, at which time it considered the Final EIR and accepted public testimony; and,

**WHEREAS**, the EIR identified several potentially significant impacts that will be reduced to a less than significant level with specified mitigation measures; therefore, approval of the Project will require adoption of findings on impacts and mitigations as set forth in attached **Exhibit A**; and,

**WHEREAS**, the EIR did not identify any significant and unavoidable impacts of the project and therefore no statement of overriding consideration is required for approval of the project; and

**WHEREAS**, pursuant to CEQA, a Mitigation Monitoring and Reporting Program has been prepared, as set forth in **Exhibit B**, which is incorporated herein by reference, to ensure that all mitigation measures relied on in the findings are fully implemented; and,

**NOW, THEREFORE, BE IT RESOLVED THAT:**

1. The above recitals are true and correct and adopted as findings of the City Council.
2. As required by CEQA and based on substantial evidence in the record, the City Council adopts the findings regarding potential significant effects of the project and mitigation contained in the attached **Exhibit A**, which is incorporated herein by reference.
5. The City Council hereby approves and adopts the Mitigation Monitoring and Reporting Program set forth in the attached **Exhibit B**, which is incorporated herein by reference, to ensure that all mitigation measures relied on in the findings are fully implemented. Compliance with the MMRP shall be a condition of any Project approval.

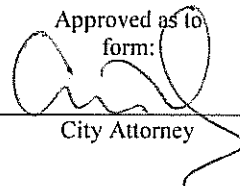
6. The City Council hereby finds that for each identified mitigation measure that requires the cooperation or action of another agency, adoption and implementation of each such mitigation measure is within the responsibility and jurisdiction of the public agency identified, and the measures can and should be adopted and/or implemented by said agency.
7. The custodian of the documents and other materials which constitute the record of proceedings for the Project is the City of Petaluma, Planning Division, Petaluma City Hall, 11 English Street, Petaluma, CA 94952.
8. This resolution shall take effect immediately upon its adoption and the City Clerk is directed to file a Notice of Determination pursuant to CEQA. Under the power and authority conferred upon this Council by the Charter of said City.

Under the power and authority conferred upon this Council by the Charter of said City.

**REFERENCE:**

I hereby certify the foregoing Resolution was introduced and adopted by the Council of the City of Petaluma at a Regular meeting on the 21<sup>st</sup> day of July, 2014, by the following vote:

Approved as to form:



City Attorney

**AYES:**

Albertson, Mayor Glass, Harris, Healy, Vice Mayor Kearney, Miller

**NOES:**

Barrett

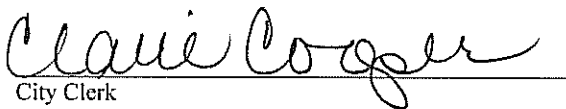
**ABSENT:**

None

**ABSTAIN:**

None

**ATTEST:**

  
City Clerk

  
Mayor

## EXHIBIT A

### FINDINGS CONCERNING SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Pursuant to Public Resources Code section 21081 and CEQA Guidelines section 15091, the City Council hereby makes the following findings with respect to the potential for significant environmental impacts of the Riverfront Mixed-Use Development (File No. 11-TSM-0130) (“Project”) and means for mitigating those impacts. For the purpose of these findings, the term EIR means the Draft and Final EIR documents collectively, unless otherwise specifies.

These findings do not attempt to describe the full analysis of each environment impact contained in the EIR. Instead the findings provide a summary description of each impact, identify the applicable mitigation measures set forth in the EIR and adopted by the City, and state findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions is in the EIR, and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the EIR’s determinations regarding mitigation measures and the Project’s impacts and mitigation measures designed to address those impacts. The facts supporting these findings are found in the record as a whole for the project.

In making these findings, the City ratifies, adopts, and incorporates into these findings the analysis and explanation in the EIR, and ratifies, adopts, and incorporates into these findings the determination and conclusions of the EIR relating to environmental impacts and mitigation measures, except to the extent that any such determinations and conclusions are specifically and expressly modified by these findings.

Many of the impacts and mitigation measures in the following findings are summarized rather than set forth in full. The text of the Draft and Final EIRs should be consulted for a complete description of the impacts and mitigations.

**Impact 4.1-1 – Criteria Pollutant Emissions:** The project would result in emissions during construction and from vehicles once development is complete, which would not be considered significant except for generation of fugitive dust during construction. This is considered a *potentially significant* impact.

AIR-1: Require implementation of Basic Control Measures during construction.

AIR-2: Include the listed construction specifications measures (GP Policy 4-P-16) such as maintaining equipment, using alternative fuels, equip construction equipment with Best Available Control Technology, and require use of CARB’s most recent certification standards.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** Implementation of mitigation measures will reduce fugitive dust emissions from grading as recommended by BAAQMD. Exhaust emissions from construction equipment and trucks for criteria pollutants would be below the BAAQMD thresholds for criteria

pollutants as described in the EIR, and would be further minimized through implementation of measures during construction activities.

**Impact 4.1-2b – Expose Sensitive Receptors to Pollutants During Construction:** Sensitive onsite receptors could be temporarily exposed to substantial concentrations of pollutants during construction due to diesel equipment exhaust.

AIR-3: Require that construction activities achieve an additional 60 percent reduction in exhaust particulate matter emissions, compared to similar equipment based on CARB statewide average emissions when building construction activities occur within 200 feet of any residential use. Methods to achieve this objective includes the use of Tier 2 standard equipment, alternatively fueled equipment (LPG fuel), and/or prohibit the use of diesel powered generators for more than two days when line power is available.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** Implementation of mitigations will reduce exhaust emissions within 200 feet of residential uses to less than applicable exposure thresholds. The mitigations employ a combination of techniques to reduce exposure concentrations including that construction equipment demonstrate optimal function and performance, use alternative fuels, and be equipped with Control Technology such as oxidation catalysts or particulate filters. Exhaust emissions from construction equipment and trucks would be reduced by 64% as a result of this measure. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.1-3 – Objectionable Odors:** Future construction and development of the site, resulting from the proposed project, will not result in the generation of objectionable odors in substantial concentrations. However, occupancy of the project site has the potential to expose new residents to objectionable odors.

AIR-4: Provide reimbursement to the City for the design and construction of the Primary Influent Pump Station mechanical odor control unit. The odor control unit shall meet current design criteria and be equivalent to the units installed at recent pump station upgrades within the City.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** Implementation of a mechanical odor control unit to replace the existing soil bed filter would substantially reduce detectable odors. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.2-1 - Wetlands:** The proposed project would result in fill of 0.24 acres of onsite wetlands, most of which are jurisdictional wetlands. Although the fill will not result in significant impacts to special status species or habitat value, due to the fact wetlands are considered sensitive habitats, this is a potentially significant impact.

BIO-1: To mitigate for the impacts to 0.24 acres of seasonal wetland habitat, the developer shall purchase credits from an approved mitigation bank at a ratio of one acre for every one acre impacted, or as otherwise directed by the regulatory agencies (U.S. Army Corps of Engineers). Prior to issuance of grading permit, proof of purchase of mitigation bank credit or verification of onsite wetland remediation to offset losses shall be submitted to the City and U.S. Army Corps of Engineers.

BIO-2: Develop final Riverfront Park design that avoids and protects wetlands. The design shall also investigate the feasibility of creating wetland habitat as part of the proposed Riverfront Park, which could serve to offset losses in lieu of purchasing credits (See BIO-1). Implement standard best management practices (BMP) to protect wetland areas during and after construction of the Riverfront Park to include, but not be limited to installation of protective staking and silt fencing to prevent inadvertent intrusion by equipment during construction.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

Those changes or alterations are within the responsibility and jurisdiction of the U.S. Army Corps of Engineers and have been, or can and should be, adopted by that agency as part of the requisite 404 Nationwide dredge and fill permit.

**Rationale for Finding:** Implementation of mitigations will protect wetland habitat and/or offset any losses to wetland habitat through the procurement of mitigation bank credits. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.2-2 – *Special Status Species*:** Site preparation could result in direct impacts to nesting bird species, if they are present, including potential special status bird species.

BIO-3: Conduct vegetation removal within areas to be developed between September 1 and January 30, outside of the general breeding bird season. If this is completed, no further mitigation is required. Otherwise, if vegetation removal or modification occurs between February 1 and June 15, require pre-construction nesting surveys within 14 days prior to such activities to determine the presence and location of nesting bird species. If vegetation removal or modification occurs between June 16 and August 31, pre-construction surveys shall be performed within 30 days prior to such activities. If active nests are present, establish temporary protective breeding season buffers to avoid direct or indirect mortality of these birds, nests or young.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** Implementation of mitigation will protect special status species by controlling the seasonal timing of vegetation removal or requiring nesting bird surveys if occurring within the breeding season. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.3-1 - Discovery of Archaeological Resource:** The project has the potential to disrupt previously undiscovered archeological resource.

CUL-1: If during the course of ground disturbing activities, historic resource is encountered, all work within a 100 foot radius of the find shall be suspended for a time deemed sufficient for a qualified and city-approved cultural resource specialist to evaluate and determine significance of the discovered resource.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** Implementation of mitigation ensures that currently unknown archeological resources will not be inadvertently disturbed or destroyed as a result of construction activities. Through the requirement to suspend construction work within 100 feet of a find, the cultural significance of such a resource can be assessed and construction work can proceed as appropriate. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.3-2 – Disturb Human Remains:** The project could disturb undiscovered human remains, including those interred outside of formal cemeteries.

CUL-2: In the event that human remains are discovered, all work shall be suspended and the Sonoma County Coroner shall be contacted in accordance with provisions of the California Public Resources Code section 5097.98-99.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** Implementation of mitigation ensures that currently unknown human remains will not be inadvertently disturbed or destroyed through ground disturbance as a result of construction activities. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.4-1 – Exposure to Seismic Hazards:** Future project structures, residents and occupants at the site would be subject to strong seismic shaking and liquefaction hazards.

GEO-1: Require implementation of all recommendations as set forth in the geotechnical investigations and updates prepared for the subject property by Miller Pacific Engineering Group (dated March 2006, July 2009, August 2011, January 2013, December 2013).

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The Project is subject to the California Building Code (CBC) which recognizes the seismic risk of developing in this state and includes stringent design and

construction requirements and engineering applicable not only to future Project structures but also to grading, foundations, retaining walls and other structures. The Project prepared a preliminary Soils and Geotechnical investigation, which was peer reviewed as part of the EIR process. Compliance with the CBC regulatory scheme and implementation of the specific recommendations provided in aforementioned studies, will result in improvement designs that mitigate the identified geotechnical conditions. The Project will be subject to a process of increasingly detailed engineering review to ensure that ground shaking is addressed at each phase of the development process and that CBC requirements are satisfied and study recommendations are carried out. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.4-2 – Soil Settlement:** Future structures at the project site would be subject to soil settlement with potential damage to structures and utilities.

GEO-2: Implement the recommendations of the project geotechnical investigations and updates prepared for the subject property by Miller Pacific Engineering Group (dated March 2006, July 2009, August 2011, January 2013, December 2013), except as modified based on site-specific refinements. Settlement mitigation measures shall include use of structural foundation systems (such as mat slabs or rigid interconnected grade beams) for residential structures, which can withstand the potential total and differential settlements in accordance with recommendations of the geotechnical investigations and deep foundations (driven piles or drilled piers) for heavier structures planned in the northern portion of the site. Ground improvement, such as with the use of Rammed Aggregate Piers (RAP), may also be appropriate at certain locations within the site.

GEO-3: Prior to the issuance of grading permits and in accordance with City of Petaluma Improvement Plan submittal requirements and procedures, the developer shall submit construction plans along with Design Level Geotechnical analysis that specifically addresses the thicker fills up to ten feet in the area near the Future Caulfield Lane Bridge in the southern portion of the site. The Improvement Plans and design level geotechnical analysis shall be subject to third party peer review in order to verify that recommended measures to address differential settlement of bay mud associated with thicker fills up to ten feet near the Future Caulfield Lane Bridge are adequate to accommodate potential settlement. In event that peer review concludes that the recommended design measures will not sufficiently minimize the effects of differential settlement, the developer shall be required to implement one of the following standard construction techniques: 1) the use of lightweight fill material in place of heavier, existing soils on areas that require thicker fill, or 2) pre-load areas that require thicker fill and allow settlement to occur prior to construction. The developer shall be responsible for the cost of the peer review and the City's Public Works Department shall coordinate the scope of service and approve findings of the peer review prior to the issuance of grading permits.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The required design-level geotechnical report and preliminary Soils and Geotechnical Investigation, which was peer reviewed as part of the EIR process, will be reviewed along with the existing geotechnical studies to ensure that through compliance with



applicable soil settlement regulation in the CBC and the City's standard engineering practices and design criteria for soil stability will be implemented in project construction and improvement to ensure that proper soil engineering, foundation design and construction will be implemented to avoid hazards from soil instability. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.4-3 – Expansive Soils:** Future structures at the project site would be subject to expansive soils with potential damage to structures and utilities.

GEO-1: Require implementation of all recommendations as set forth in the geotechnical investigations and updates prepared for the subject property by Miller Pacific Engineering Group (dated March 2006, July 2009, August 2011, January 2013, December 2013).

HYDRO-1: Prepare final drainage plan as part of the Subdivision Improvement Plans that provides calculations and documentation that the site storm drain system and discharge culverts have adequate capacity to serve the project and watershed area at full buildout.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The required design-level geotechnical report will build on the existing geotechnical studies to show how regulation in the CBC and the City's standard engineering practices and design criteria for soil stability will be implemented in project construction and improvement. The City will review the design level report and ensure compliance with applicable CBC regulation. The mitigation will ensure that proper soil engineering, foundation design, adequate site storm drain system capacity, and construction will be implemented to avoid hazards from expansive soils. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.4-4 – Erosion:** Grading at the project site could result in inadvertent erosion or soil transport into the Petaluma River.

HYDRO-2: In accordance with National Pollution Discharge Elimination System (NPDES) regulations, the developer shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for grading and construction of subdivision improvements.

HYDRO-3: The applicant shall prepare and implement an erosion control plan for the subdivision grading and each subsequent development phase site plan.

HYDRO-4: The applicant shall prepare and implement an erosion control plan for construction of the trail and improvements for the offsite Riverfront Park.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** Implementation of mitigations would substantially reduce the potential

for erosion and sedimentation by ensuring that construction activities employ the most effective erosion control practices such as site watering, stabilizing soils when inactive, and avoiding active construction during periods of heavy precipitation. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.5-2 – Exposure to Soil-Water Contamination:** The potential reuse of onsite stockpiled soils or discovery of unknown hazardous materials during construction could pose a hazard to workers during construction.

HAZMAT-1: Require that the quality of the stockpiled soils be reaffirmed / tested prior to use for onsite fill, which shall be done following the Clean Imported Fill Material Information Advisory prepared by the DTSC (DTSC 2001) in accordance with the recommendation set forth in the 2013 Iris Environmental Phase I Environmental Site Assessment.

HAZMAT-2: Prepare and implement a Risk Management Plan (RMP) that provides the procedures to properly manage site groundwater that may be encountered during construction activities.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The mitigation recognizes that unknown hazardous materials may be discovered during construction and ensures that an effective construction worker safety program is established, so as to limit exposure of workers to hazardous materials. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.6-1 – Stormwater Drainage:** Buildout of the project site would result in a significant increase in stormwater runoff that would ultimately discharge into the Petaluma River, and which would result in potentially significant impacts if storm drains are not properly sized.

HYDRO-1: Prepare final drainage plan as part of the Subdivision Improvement Plans that provides calculations and documentation that the site storm drain system and discharge culverts have adequate capacity to serve the project and watershed area at full buildout.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The mitigation recognizes that adequately sized infrastructure is necessary in order to ensure that stormwater runoff capacity is provided as part of the Improvement Plans. The preliminary plan shows that sufficiently sized pipes are feasible and mitigation requires that final drainage plans provide precise calculation and documentation that discharge facilities are properly sized. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.6-2 – Water Quality & Stormwater Discharge:** Grading activities and future runoff from the developed project site could result in non-point and point source pollution into the

Petaluma River, if not properly controlled. This is a potentially significant impact since the river is listed as impaired for nutrients, pathogens and sediment.

HYDRO-2: In accordance with National Pollution Discharge Elimination System (NPDES) regulations, the developer shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for grading and construction of subdivision improvements.

HYDRO-3: The applicant shall prepare and implement an erosion control plan for the subdivision grading and each subsequent development phase site plan.

HYDRO-4: The applicant shall prepare and implement an erosion control plan for construction of the trail and improvements for the offsite Riverfront Park.

HYDRO-5: Subsequent development phases over one acre in size shall submit plans and detailed calculations to show that requirements for post-construction runoff treatment have been met in accordance with the City's stormwater management regulations.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The mitigation recognizes that the project is subject to NPDES and other water quality control regulations that will protect water quality. Implementation of mitigations would substantially reduce the potential for water quality degradation through accidental release of potentially harmful or hazardous materials and sediment by minimizing the potential for such materials and sediment to enter the Petaluma River. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.7-1 – Elevated Noise Exposure:** The project could expose people to noise levels that exceed the Petaluma General Plan 2025 Land Use-Noise Compatibility Standards and City regulations.

NOISE-1: Pursuant to General Plan Policy 10-P-3C and the CPSP EIR Mitigation Measure 10-1, a detailed acoustical report shall be prepared by a qualified acoustical specialist as part of the design phase to determine the noise control treatments for the residential buildings, offices and the hotel to meet local and state standards. Noise attenuation measures shall include as appropriate thicker walls, stucco siding, sound insulating windows and/or doors, building and bedroom orientation, and other measures pursuant to the detailed acoustical report. To achieve the noise reduction requirements, some form of forced air mechanical ventilation, satisfactory to the local building official, would be required in all residential units and the hotel. Special sound rated building elements such as windows and doors may also be necessary to reduce the intrusiveness of the train noise given that typical noise levels could reach 95 dBA Lmax outside the nearest townhomes if Quiet Zone status is not approved.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The mitigation ensures that noise attenuation measures are further refined through the design level acoustical report. Implementation will be realized through various attenuation techniques that consider the entire building envelope to achieve City prescribed noise standards. Noise attenuation will minimize noise intrusion and substantially lessen interior noise levels. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.7-5 – Temporary Increase in Noise:** Noise levels generated during construction activities would result in a temporary increase in ambient noise levels for an approximately six-year period during buildout of future development phases.

NOISE-2: In accordance with Mitigation Measure 10-2 of the Central Petaluma Specific Plan, require implementation of the following measures during all phases of project construction:

- Construction Scheduling. Limit noise-generating construction activities to daytime, weekday hours (7 AM to 6 PM) and 9 AM to 5 PM on weekends and holidays. When construction is occurring within 100 feet of existing residences, then construction shall be prohibited on Sundays and Holidays.
- Equipment. Properly muffle and maintain all construction equipment powered by internal combustion engines.
- Idling Prohibitions. Prohibit unnecessary idling of internal combustion engines.
- Equipment Locations and Shielding. Locate all stationary noise sources - generally equipment such as air compressors - as far as practical from existing, nearby noise sensitive receptors.
- Quiet Equipment Selection. Select quiet construction equipment, particularly air compressors, whenever possible.
- Noise Disturbance Coordinator. Designate a project construction supervisor as “Noise Disturbance Coordinator” who will be responsible for responding to any local complaints about construction noise. The Disturbance Coordinator will determine the cause of the noise complaint and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the Disturbance Coordinator.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The mitigation ensures that construction activities are limited to the least noise sensitive time of day, that equipment is outfitted with noise reducing devices, and stationary noise sources be located as far as possible from sensitive receptors. Implementation of these measures will ensure that construction noise impacts will be reduced to less than significant. Therefore, after applying this measure, the impact would be less than significant.

**Impact 4.8-4 – Rail Crossing:** The project will result in an increase in daily and peak hour trips, but would not substantially increase hazards due to conflicts between motorists, pedestrians, bicyclists and rail operations. However, if supplemental safety measures to be implemented as part of the SMART rail service are not in place before project completion, potential hazards could result.

TRAF-1: If SMART rail service (and the supplemental safety measures that may be needed for it) is delayed to such an extent that the Riverfront project is built first, require installation of the supplemental safety measures at the existing Caulfield Lane at-grade crossing to include an additional exit gate on the southwest side of the crossing to preclude vehicles from navigating around the entry gates to proceed eastbound on Caulfield.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The mitigation ensures that safety measures are installed for the Caulfield Lane at-grade crossing to facilitate increased activity, including pedestrian, cyclists and motorists, at that intersection, which provides for an additional exit gate. Implementation of this feature will ensure that safety concerns associated with the existing at-grade crossing will be reduced to less than significant. Therefore, after applying this measure, the impact would be less than significant.

**Cumulative Impact – Traffic:** The project will contribute to significant cumulative near-term impacts.

CUM-1. Require payment prior to recordation of the Final Map of the project's 21% pro-rata share of the cost of signalization at Hopper Street/Caulfield Lane in the future when an extension of Caulfield Lane over the Petaluma River is completed.

CUM-2. The Applicant shall lengthen the westbound left turn pocket at Lakeville Street/Caulfield Lane to approximately 250 feet, and install a raised median on the westbound approach to physically prohibit illegal left turn movements into and out of adjacent properties, as recommended in the project traffic report, in order to improve capacity and safety at the intersection.

**Impact After Mitigation:** Less than Significant

**Finding:** Changes or alteration have been required in, or incorporated into the Project, which avoid or substantially lessen the significant environmental effect identified in the EIR.

**Rationale for Finding:** The mitigation recognizes that the project will contribute to cumulative traffic related impacts and requires that fees and improvements be provided to cover the project's share. Implementation of these measures will ensure that cumulative traffic impacts will be reduced to less than significant. Therefore, after applying this measure, the impact would be less than significant.

**EXHIBIT B**  
**MITIGATION MONITORING AND REPORTING PROGRAM**

**MITIGATION MONITORING AND REPORTING PROGRAM PROCEDURES**

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring and Reporting Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The City of Petaluma (the “City”) is the Lead Agency for the Riverfront Mixed-Use Development and is therefore responsible for enforcing and monitoring the mitigation measures in this Mitigation Monitoring and Reporting Program (MMRP).

A Draft Environmental Impact Report (DEIR) has been prepared to address the potential environmental impacts of the project. Where appropriate, this environmental document identified project design features or recommended mitigation measures to avoid or to mitigate potential impacts identified to a level where no significant impact on the environment would occur. This MMRP is designed to monitor implementation of the required mitigation measures and conditions set forth for project approval for the proposed project as identified in the Draft Environmental Impact Report (DEIR) and the Final Environmental Impact Report (FEIR). The mitigation measures as well as the conditions set forth for project approval are listed and categorized by Section with an accompanying identification of the following:

- **Implementation Action:** Describes how the measures will be implemented.
- **Monitoring/Reporting Responsibility:** Identifies the party that is responsible for implementing and enforcing the measure, and the agency to which reports involving feasibility, compliance, implementation and development are made.
- **Timing Requirements:** Specifies the stage at which the measure is in effect and identifies the duration that the measure remains effective including pre-construction, construction and operation.
- **Reporting Requirements:** Identifies the reporting method to ensure compliance with measure.

The MMRP for the proposed project will be in place throughout all phases of the project. The project applicant shall be responsible for implementing all mitigation measures unless otherwise noted. The applicant shall also be obligated to provide certification, as identified below to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented. The City will be used as the basic foundation for the MMRP procedures and will also serve to provide the documentation for the reporting program. Generally, each certification report will be submitted to the City in a timely manner following completion/ implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The City shall assure that project construction occurs in accordance with the MMRP.

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<b>Air Quality</b>					
<p>AIR-1: Require implementation of the following measures during construction:</p> <ul style="list-style-type: none"> <li>a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day or to maintain a minimum soil moisture of 12%.</li> <li>b) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.</li> <li>c) The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.</li> <li>d) All trucks and equipment, including their tires, shall be washed off prior to leaving the site.</li> <li>e) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>f) All visible mud or dirt tracked-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited.</li> <li>g) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.</li> <li>h) Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel.</li> <li>i) All paving shall be completed as soon as possible after pipeline replacement work is finished.</li> <li>j) Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.</li> <li>k) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 2 minutes (California airborne toxics control measure Title 13, section 2485 of</li> </ul>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS &amp; ALL DEVELOPMENT PHASES.</li> <li>• Measures shall be included in the Construction Specifications for grading plans, subdivision improvement plans, and grading/construction plans for subsequent development phases.</li> <li>• Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	<p>The Petaluma Public works &amp; Utilities Department is responsible for review of improvement plans and Building Department is responsible for review of the building plans to ensure that measures are included on construction specifications.</p>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits for review of plans.</li> <li>• On-going site inspections during grading and construction, at the discretion of the City.</li> </ul>	<p>Construction Monitoring Report from Applicant that documents periodic site inspections during grading to ensure measures and verification that measures are in place.</p>	<p>Subdivision Improvements</p> <hr/> <p>Development Phases</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<p>California Code of Regulations (CCR) establishes a maximum idling time of 5 minutes). Clear signage shall be provided for construction workers at all access points.</p> <p>l) All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</p> <p>m) Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.</p> <p>n) Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.</p> <p>o) Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).</p> <p>p) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading, unless seeding or soil binders are used.</p>					
<p>AIR-2: Include the following measures as part of the construction specifications (GP Policy 4-P-16):</p> <p>a) Maintain construction equipment engines in good condition and in proper tune per manufacturer's specification for the duration of construction;</p> <p>b) Use alternative fuel construction equipment if available (i.e., compressed natural gas, liquid petroleum gas);</p> <p>c) Require that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM through the use of add-on control devices such as diesel oxidation catalysts or particulate filters; and</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS &amp; ALL DEVELOPMENT PHASES.</li> <li>• Measures shall be included in the Construction Specifications for all improvement and construction plans.</li> <li>• Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	<p>The Petaluma Public Works &amp; Utilities Department is responsible for review of improvement plans and Building Department is responsible for review of the building plans to ensure that measures are included on construction plans.</p>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading and building permits for review of plans.</li> <li>• On-going site inspections during grading and construction, at the discretion of the City.</li> </ul>	<p>Construction Monitoring Report from Applicant that documents periodic site inspections during grading to ensure measures and verification that measures are in place.</p>	<p>Subdivision Improvements</p> <hr/> <p>Development Phases</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>



Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<p>d) Require all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.</p>					<p>_____</p> <p>_____</p>
<p>AIR-3: Require that construction activities implement the following measures at the project sites to reduce construction equipment exhaust when building construction activities occur within 200 feet of any residential use. The contractor shall develop and the City shall approve a plan demonstrating that the off-road equipment (more than 50 horsepower and on site for more than 2 consecutive workdays) to be used in project construction (i.e., owned, leased, and subcontractor vehicles) would achieve an additional 60 percent reduction in exhaust particulate matter emissions, compared to similar equipment based on CARB statewide average emissions. Based on the CalEEMod modeling, a feasible method to achieve this objective would be the following:</p> <p>a) All diesel-powered construction equipment more than 50 horsepower used on-site during all construction phases for more than two days consecutively shall meet or exceed U.S. EPA Tier 2 standards for particulate matter emissions or substituted with alternatively fueled equipment (e.g., LPG fuel).</p> <p>b) Prohibit use of diesel-powered generators for more than two days when line power is available.</p> <p>c) All non-mobile construction equipment shall be alternatively fueled or meet U.S. EPA Tier 2 standards for particulate matter emissions</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS &amp; ALL DEVELOPMENT PHASES.</li> <li>• Measures shall be included in the Construction Specifications for all improvement and construction plans.</li> <li>• Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	<p>The Petaluma Public Works &amp; Utilities Department is responsible for review of improvement plans and Building Department is responsible for review of the building plans to ensure that measures are included on construction plans.</p>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading and building permits for review of plans.</li> <li>• On-going site inspections during grading and construction, at the discretion of the City.</li> </ul>	<p>Construction Monitoring Report from Applicant that documents periodic site inspections during grading to ensure measures and verification that measures are in place.</p>	<p>Subdivision Improvements</p> <p>_____</p> <p>Development Phases</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>AIR-4: Provide reimbursement to the City for the design and construction of the Primary Influent Pump Station mechanical odor control unit. The odor control unit shall meet current design criteria and be equivalent to the units installed at recent pump station upgrades within the City.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS.</li> <li>• City shall determine re-imburement amount.</li> </ul>	<ul style="list-style-type: none"> <li>• The Petaluma Public Works &amp; Utilities Department is responsible for determining the re-imburement amount, and applicant is responsible</li> </ul>	<ul style="list-style-type: none"> <li>• Re-imburement shall be paid prior to issuance of construction permits.</li> </ul>	<p>None Required</p>	<p>Subdivision Improvements</p> <p>_____</p>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
		for payment. • The Petaluma Public Works & Utilities Department is responsible for all improvements at the PIP pump station.	• PIP improvements shall be complete prior to issuance of occupancy.		
<b>Biological Resources</b>					
<p>BIO-1: To mitigate for the impacts to 0.24 acres of seasonal wetland habitat, the developer shall consult with agencies to identify feasibility of creating onsite mitigation areas through remediation within the Riverfront park area. If onsite mitigation is determined to be infeasible then, credits shall be purchased from an approved mitigation bank at a ratio of one acre for every one acre impacted, or as otherwise directed by the regulatory agencies. Due to general low-quality of the existing wetland habitat (e.g. presence of non-native species, disturbed soils) within the project site, a mitigation ratio of one acre mitigated for each acre impacted is recommended by the biologist. Prior to issuance of grading permit, proof of purchase of mitigation bank credit or verification of onsite wetland remediation to offset losses shall be submitted to the City and U.S. Army Corps of Engineers.</p> <p>According to information provided by the project biologist, the Burdell wetland mitigation bank, located just south of Petaluma, has mitigation bank credits available.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS.</li> <li>• Purchase mitigation bank credit and submit proof to City, USACOE.</li> </ul>	<ul style="list-style-type: none"> <li>• The Applicant is responsible for purchase of wetland mitigation bank credit (including additional area that may be required as a result of Mitigation BIO-6), and shall provide proof to the City Community Development Department and the USACOE.</li> </ul>	Prior issuance of grading permit and/or any removal of vegetation.	Applicant shall provide the pre-construction survey to Community Development Dept. If nesting birds are found, applicant shall provide documentation to the Community Development Dept. that demonstrates compliance with actions specified in the measure (i.e., delay construction or establish appropriate buffer).	Subdivision Improvements <hr/>
<p>BIO-2: Develop final Riverfront Park design that avoids and protects wetlands. The design shall also investigate the feasibility of creating wetland habitat as part of the proposed Riverfront Park, which could serve to offset losses in lieu of purchasing credits (See BIO-1). Implement standard best management</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO RIVERFRONT PARK DEVELOPMENT.</li> <li>• Measures shall be included in the Construction Specifications for</li> </ul>	The Petaluma Community Development Department is responsible for review of Riverfront Park grading and/or construction plans to ensure that measures are	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits or initiation of Riverfront Park</li> </ul>	Construction Monitoring Report from Applicant that documents periodic site inspections during	Riverfront Park <hr/>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
practices (BMP) to protect wetland areas during and after construction of the Riverfront Park to include, but not be limited to installation of protective staking and silt fencing to prevent inadvertent intrusion by equipment during construction.	Riverfront Park grading plan and/or construction plans. <ul style="list-style-type: none"> <li>Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	included on construction specifications.	development. <ul style="list-style-type: none"> <li>On-going site inspections during construction, at the discretion of the City.</li> </ul>	construction to ensure measures and verification that measures are in place.	
BIO-3: Conduct vegetation removal within areas to be developed between September 1 and January 30, outside of the general breeding bird season. If this is completed, no further mitigation is required. Otherwise, if vegetation removal or modification occurs between February 1 and June 15, require pre-construction nesting surveys within 14 days prior to such activities to determine the presence and location of nesting bird species. If vegetation removal or modification occurs between June 16 and August 31, pre-construction surveys shall be performed within 30 days prior to such activities. If active nests are present, establish temporary protective breeding season buffers to avoid direct or indirect mortality of these birds, nests or young. The appropriate buffer distance is dependent on the species, surrounding vegetation and topography and shall be determined by a qualified biologist as appropriate to prevent nest abandonment and direct mortality during construction.	<ul style="list-style-type: none"> <li>Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS, RIVERFRONT PARK DEVELOPMENT, &amp; ALL DEVELOPMENT PHASES.</li> <li>Conduct pre-construction survey in accordance with actions specified in Measure.</li> </ul>	<ul style="list-style-type: none"> <li>The Applicant is responsible for pre-construction survey if removal occurs within the nesting season and submittal to the Community Development Department for review.</li> <li>The Petaluma Community Development Department staff are responsible for review of pre-construction survey.</li> </ul>	Prior issuance of grading permit and/or any removal of vegetation.	Applicant shall provide the pre-construction survey to Community Development Dept. If nesting birds are found, applicant shall provide documentation to the Community Development Dept. that demonstrates compliance with actions specified in the measure (i.e., delay construction or establish appropriate buffer).	Subdivision Improvements <hr/> Riverfront Park <hr/> Development Phases <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<b>Cultural Resources</b>					
CULT-1: If during the course of ground disturbing activities, including, but not limited to excavation, grading and construction, a potentially significant prehistoric or historic resource is encountered, all work within a 100 foot radius of the find shall be suspended for a time deemed sufficient for a qualified and city-approved cultural resource specialist to adequately evaluate and determine significance of the discovered resource and provide treatment recommendations.	<ul style="list-style-type: none"> <li>Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS, RIVERFRONT PARK DEVELOPMENT, &amp; ALL DEVELOPMENT PHASES.</li> <li>Measure shall be included in the Construction Specifications for grading plans, subdivision improvement plans, and grading/construction plans for</li> </ul>	The Petaluma Public works Department is responsible for review of improvement and construction plans and Building Department is responsible for review of the building plans to ensure that measure is included on	<ul style="list-style-type: none"> <li>Prior to the issuance of the grading permits for subdivision improvements and grading, building and/ construction plans for other</li> </ul>	None required unless resource is uncovered during construction.	Subdivision Improvements <hr/> Riverfront Park <hr/> Development Phases <hr/>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
Should a significant archeological resource be identified a qualified archaeologist shall prepare a resource mitigation plan and monitoring program to be carried out during all construction activities.	subsequent development phases. <ul style="list-style-type: none"> <li>Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	construction specifications.	development.		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
CUL-2: In the event that human remains are discovered, all work shall be suspended and the Sonoma County Coroner shall be contacted in accordance with provisions of the California Public Resources Code section 5097.98-99 and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code 5097, so that the "Most Likely Descendant" can be designated.	<ul style="list-style-type: none"> <li>Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS, RIVERFRONT PARK DEVELOPMENT, &amp; ALL DEVELOPMENT PHASES.</li> <li>Measure shall be included in the Construction Specifications for grading plans, subdivision improvement plans, and grading/construction plans for subsequent development phases.</li> <li>Applicant shall notify the County Coroner and the City Community Development Department in the event that human remains are discovered.</li> </ul>	The Petaluma Public works Department is responsible for review of improvement and construction plans and Building Department is responsible for review of the building plans to ensure that measure is included on construction specifications.  The applicant is responsible for carrying out provisions and informing the City Community Development Department in accordance with the Public Resources Code.	<ul style="list-style-type: none"> <li>Prior to the issuance of the grading permits for subdivision improvements and grading, building and/ construction plans for other development.</li> </ul>	None required unless resource is uncovered during construction.	Subdivision Improvements <hr/> Development Phases <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<b>Geology &amp; Soils</b>					
GEO-1: Require implementation of all recommendations as set forth in the geotechnical investigations and updates prepared for the subject property by Miller Pacific Engineering Group (dated March 2006, July 2009, August 2011, January 2013, December 2013), including but not limited to recommendations for site and soil preparation, foundation designs, drainage and installation of utilities.	<ul style="list-style-type: none"> <li>Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS, RIVERFRONT PARK DEVELOPMENT &amp; ALL DEVELOPMENT PHASES.</li> <li>The applicant shall obtain a geotechnical engineer to review the final project plans and specifications to determine if they are consistent</li> </ul>	<ul style="list-style-type: none"> <li>The Public Works &amp; Utilities Department is responsible for review of geotechnical studies, Subdivision Improvement Plans, and construction plans. Building Dept. is responsible for review of plans to ensure measures</li> </ul>	<ul style="list-style-type: none"> <li>Prior to Improvement Plan approval for applicant submittal of geotechnical reviews.</li> <li>Prior to the issuance of the</li> </ul>	None required.	Subdivision Improvements <hr/> Riverfront Park <hr/> Development Phases <hr/> <hr/> <hr/> <hr/>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<p>Buildings shall require the following: a) structural foundation systems, such as mat slabs or rigid interconnected grade beams, able to resist the anticipated strong ground shaking and potential for differential movement caused by liquefaction and/or consolidation of the bay mud, b) soil improvement, c) deep foundation systems, or d) other engineering techniques as recommended in additional geotechnical investigations of liquefaction hazards. All structures shall meet the California Building Code regulations and design requirements for seismic safety.</p>	<p>with the recommendations as outlined in the geotechnical report(s) and provide a letter to the City with findings of the review.</p> <ul style="list-style-type: none"> <li>The geotechnical engineer shall inspect the construction work and shall certify to the City, prior to acceptance of the improvements or issuance of a certificate of occupancy that the improvements have been constructed in accordance with the geotechnical specifications.</li> </ul>	<p>have been incorporated.</p> <ul style="list-style-type: none"> <li>The applicant shall provide a letter to the City of findings of the geotechnical engineer's review of the project plans.</li> </ul>	<p>grading and building permits for City staff review of plans.</p> <ul style="list-style-type: none"> <li>On-going site inspections during grading and construction, at the discretion of the City.</li> <li>All construction shall be subject to inspection by the Building Division prior to issuance of a Certificate of Occupancy.</li> </ul>		<p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>GEO-2: Implement the recommendations of the project geotechnical investigations and updates prepared for the subject property by Miller Pacific Engineering Group (dated March 2006, July 2009, August 2011, January 2013, December 2013), except as modified based on site-specific refinements. Settlement mitigation measures shall include use of structural foundation systems (such as mat slabs or rigid interconnected grade beams) for residential structures, which can withstand the potential total and differential settlements in accordance with recommendations of the geotechnical investigations and deep foundations (driven piles or drilled piers) for heavier structures planned in the northern portion of the site. Ground improvement, such as with the use of Rammed Aggregate Piers (RAP), may also be appropriate at certain locations within the site.</p>	<ul style="list-style-type: none"> <li>Include measure as Condition of Approval. APPLIES TO ALL DEVELOPMENT PHASES.</li> <li>The applicant shall obtain a geotechnical engineer to review the final project plans and specifications to determine if they are consistent with the recommendations as outlined in the geotechnical report(s) and provide a letter to the City with findings of the review.</li> <li>The geotechnical engineer shall inspect the construction work and shall certify to the City, prior to acceptance of the improvements or issuance of a certificate of occupancy that the improvements have been constructed in accordance with the geotechnical specifications.</li> </ul>	<ul style="list-style-type: none"> <li>The Public Works &amp; Utilities Department is responsible for review of geotechnical studies, Subdivision Improvement Plans, and construction plans. Building Dept. is responsible for review of plans to ensure measures have been incorporated.</li> <li>The applicant shall provide a letter to the City of findings of the geotechnical engineer's review of the project plans.</li> </ul>	<ul style="list-style-type: none"> <li>Prior to the issuance of the grading and building permit.</li> <li>All construction shall be subject to inspection by the Building Division and must conform to all applicable code requirements and approved improvement plans prior to issuance of a Certificate of Occupancy.</li> </ul>	<p>None required.</p>	<p>Development Phases</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<p>GEO-3: Prior to the issuance of grading permits and in accordance with City of Petaluma Improvement Plan submittal requirements and procedures, the developer shall submit construction plans along with Design Level Geotechnical analysis that specifically addresses the thicker fills up to ten feet in the area near the Future Caulfield Lane Bridge in the southern portion of the site. The Improvement Plans and design level geotechnical analysis shall be subject to third party peer review in order to verify that recommended measures to address differential settlement of bay mud associated with thicker fills up to ten feet near the Future Caulfield Lane Bridge are adequate to accommodate potential settlement. In event that peer review concludes that the recommended design measures will not sufficiently minimize the effects of differential settlement, the developer shall be required to implement one of the following standard construction techniques: 1) the use of lightweight fill material in place of heavier, existing soils on areas that require thicker fill, or 2) pre-load areas that require thicker fill and allow settlement to occur prior to construction. The developer shall be responsible for the cost of the peer review and the City's Public Works Department shall coordinate the scope of service and approve findings of the peer review prior to the issuance of grading permits.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO ALL DEVELOPMENT PHASES.</li> <li>• The City shall obtain a third party geotechnical engineer to conduct a peer review of the final project plans and specifications to determine if engineering designs adequately address settlement.</li> </ul>	<ul style="list-style-type: none"> <li>• The Public Works &amp; Utilities Department is responsible for review of geotechnical studies, Subdivision Improvement Plans, and construction plans.</li> <li>• The Public Works &amp; Utilities Department is responsible for obtaining a third party peer reviewer and verifying findings the independent assessment.</li> <li>• The applicant shall provide re-imbusement for the cost of the peer review.</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permit.</li> </ul>	<p>None required.</p>	<p>Development Phases</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<b>Hazardous Materials</b>					
<p>HAZMAT-1: Require that the quality of the stockpiled soils be reaffirmed / tested prior to use for onsite fill, which shall be done following the Clean Imported Fill Material Information Advisory prepared by the DTSC (DTSC 2001) in accordance with the recommendation set forth in the 2013 Iris Environmental Phase I Environmental Site Assessment.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS.</li> <li>• The applicant shall provide the additional review by a qualified professional and provide a letter to the City with findings of the review.</li> </ul>	<ul style="list-style-type: none"> <li>• The Public Works &amp; Utilities Department is responsible for review.</li> <li>• The applicant shall provide a letter to the Petaluma Community Development and Public Works &amp; Utilities Departments.</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits.</li> </ul>	<p>None required.</p>	<p>Subdivision Improvements</p> <hr/> <hr/> <hr/> <hr/>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<p>HAZMAT-2: Prepare and implement a Risk Management Plan (RMP) that provides the procedures to properly manage site groundwater that may be encountered during construction activities. The plan shall address procedures for discovery of any unknown features or environmental conditions that may be encountered during activities that will disturb site soils.</p> <p>The RMP shall include, but not be limited to the following components as set forth in the 2013 Phase I Environmental Site Assessment report:</p> <ul style="list-style-type: none"> <li>a) Soil management: Provide guidelines for identification and analysis of unknown environmental conditions and define responsibilities for management of discovery of unknown features or site conditions.</li> <li>b) Groundwater management: Prohibit use of groundwater encountered during construction activities for dust control and allow discharge of groundwater to surface waters only pursuant to a permit issued from applicable regulatory agencies. All permit conditions must be satisfied prior to discharge.</li> <li>c) Preparation and implementation of a site-specific Environmental Health and Safety Plan by the general contractor to ensure that appropriate worker health and safety measures are in place during redevelopment activities. Elements of the plan must include all practices and procedures necessary to comply with all new and existing Federal, California, and local statutes, ordinances, or regulations regarding health and safety. Specific components of the EHASP must include the following: identification of site hazards; assignment of specific health and safety responsibilities for site work; establishment of appropriate general work practices; establishment of control zones and decontamination procedures; job hazard analysis / hazard mitigation procedures; air monitoring; required personal protective and related safety equipment; and contingency and emergency information.</li> </ul>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS &amp; ALL DEVELOPMENT PHASES.</li> <li>• Applicant shall have a management plan prepared by a qualified professional and include measures in the Construction Specifications for grading and improvement plans.</li> <li>• Applicant shall have grading and utility plans reviewed by a qualified professional in accordance with actions specified in the measure.</li> </ul>	<ul style="list-style-type: none"> <li>• Applicant is responsible for having management plan prepared, incorporating measures in construction plans, and review of grading and improvements by qualified profession.</li> <li>• The Petaluma Public Works &amp; Utilities Department is responsible for review of plans to ensure that construction specifications are included on construction plans.</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits for review of plans.</li> </ul>	<p>None Required.</p>	<p>Subdivision Improvements</p> <hr/> <p>Development Phases</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<b>Hydrology &amp; Water Quality</b>					
<p>HYDRO-1: Prepare final drainage plan as part of the Subdivision Improvement Plans that provide calculations and documentation that the site storm drain system and discharge culverts have adequate capacity to serve the project and watershed area at full buildout. The storm drain system design shall be reviewed and approved by the Sonoma County Water Agency.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS.</li> <li>• Applicant shall prepare final drainage plan.</li> <li>• Applicant shall provide evidence of RWQCB approval of discharge requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• The applicant is responsible for incorporating the drainage plan recommendations into the subdivision improvement plans.</li> <li>• City Public Works &amp; Utilities Department is responsible for reviewing plans and submitting to Sonoma County Water Agency for review and approval.</li> </ul>	<p>Prior to issuance of the grading and building permits.</p>	<p>None Required</p>	<p>Subdivision Improvements</p> <hr/>
<p>HYDRO-2: In accordance with National Pollution Discharge Elimination System (NPDES) regulations, the developer shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for grading and construction of subdivision improvements. The SWPPP shall also include provisions for the offsite Riverfront Park. All subsequent development phases over one acre in size shall prepare and implement a SWPPP. The SWPPP shall address erosion and sedimentation controls during all phases of construction, storage and use of fuels, and use and clean-up of fuels and hazardous materials. The SWPPP shall prohibit fueling, cleaning, or maintenance of equipment except in designated areas located as far from the river as possible. As a precaution, require contractor to maintain adequate materials onsite for containment and clean-up of any spills. The developer shall provide approval documentation from the RWQCB to the City verifying compliance with NPDES requirements. Acceptable proof of compliance is the Notice of Intent with a WDID number or other equivalent documentation.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS, RIVERFRONT PARK DEVELOPMENT &amp; ALL DEVELOPMENT PHASES.</li> <li>• Applicant responsible for preparing SWPPP.</li> <li>• Measures shall be included in the Construction Specifications for grading plans, subdivision improvement plans, and grading/construction plans for subsequent development phases and Riverfront Park.</li> <li>• Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	<p>The Petaluma Public Works &amp; Utilities Department is responsible for review of SWPPP and construction plans to ensure that measures are included on construction plans and specifications.</p>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits.</li> <li>• On-going site inspections during grading and construction, at the discretion of the City.</li> </ul>	<p>Construction Monitoring Report from Applicant that documents periodic site inspections during grading to ensure measures and verification that measures included in SWPPP are in place.</p>	<p>Subdivision Improvements</p> <hr/> <p>Riverfront Park</p> <hr/> <p>Development Phases</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>



Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<p>HYDRO-3: The applicant shall prepare and implement an erosion control plan for the subdivision grading and each subsequent development phase site plan. The plan shall be reviewed and approved by the City of Petaluma prior to issuance of a grading permit for the proposed development. The erosion control plan shall include phasing of grading, limiting areas of disturbance, designation of restricted-entry zones, diversion of runoff away from disturbed areas, protective measures for sensitive areas, outlet protection and provision for revegetation or mulching. The plan shall also prescribe treatment measures to trap sediment, such as inlet protection, straw bale barriers, straw mulching, straw wattles, silt fencing, check dams, terracing, and siltation or sediment ponds. Catchment and settlement ponds will be constructed to contain silt being deposited at temporary outlets. Temporary outlets will be rocked with silt control. Fiber rolls, silt fences and fiber mats will be installed on all slopes.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS &amp; ALL DEVELOPMENT PHASES.</li> <li>• Applicant shall prepare and submit an Erosion and Sediment Control Plan to City prepared by a qualified erosion control specialist.</li> <li>• Measures shall be included in the Construction Specifications for grading plans, subdivision improvement plans, and grading/construction plans for subsequent development phases.</li> <li>• Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	<p>The Petaluma Public works &amp; Utilities Department is responsible for review of erosion control and construction plans to ensure that measures are included on construction plans and specifications.</p>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits.</li> <li>• On-going site inspections during grading and construction, at the discretion of the City.</li> </ul>	<p>Construction Monitoring Report from Applicant that documents periodic site inspections during grading to ensure measures and verification that measures included in erosion control plan are in place.</p>	<p>Subdivision Improvements _____</p> <p>Development Phases _____ _____ _____ _____ _____ _____ _____</p>
<p>HYDRO-4: The applicant shall prepare and implement an erosion control plan for construction of the trail and improvements for the offsite Riverfront Park, including, but not limited to: installing hay bales or appropriate temporary silt fencing adjacent to the perimeter of the work area to prevent inadvertent transport of sediments into the Petaluma River; limiting ground disturbance and vegetation removal during construction; conducting work prior to the rainy season; protecting disturbed areas during the rainy season; and immediately revegetating disturbed areas.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO RIVERFRONT PARK &amp; ALL DEVELOPMENT PHASES.</li> <li>• Applicant shall prepare and submit an Erosion and Sediment Control Plan to City prepared by a qualified erosion control specialist.</li> <li>• Measures shall be included in the construction plans.</li> <li>• Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	<p>The Petaluma Public works &amp; Utilities Department is responsible for review of erosion control and construction plans to ensure that measures are included.</p>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits.</li> <li>• On-going site inspections during grading and construction, at the discretion of the City.</li> </ul>	<p>Construction Monitoring Report from Applicant that documents periodic site inspections during grading to ensure measures and verification that measures included in erosion control plan are in place.</p>	<p>Riverfront Park _____</p> <p>Development Phases _____</p>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<p>HYDRO-5: Subsequent development phases over one acre in size shall submit plans and detailed calculations to show that requirements for post-construction runoff treatment have been met in accordance with the City's stormwater management regulations.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO ALL DEVELOPMENT PHASES.</li> <li>• Applicant shall prepare stormwater treatment plan for each development phase.</li> </ul>	<p>The Petaluma Public works &amp; Utilities Department is responsible for review of stormwater management plans.</p>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits.</li> </ul>	<p>None required.</p>	<p>Development Phases</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<b>Noise</b>					
<p>NOISE-1: Pursuant to General Plan Policy 10-P-3C and the CPSP EIR Mitigation Measure 10-1, a detailed acoustical report shall be prepared by a qualified acoustical specialist as part of design phase to determine the noise control treatments for the residential buildings, offices and the hotel to meet local and state standards. Noise attenuation measures shall include as appropriate thicker walls, stucco siding, sound insulating windows and/or doors, building and bedroom orientation, and other measures pursuant to the detailed acoustical report. To achieve the noise reduction requirements, some form of forced air mechanical ventilation, satisfactory to the local building official, would be required in all residential units and the hotel. Special sound rated building elements such as windows and doors may also be necessary to reduce the intrusiveness of the train noise given that typical noise levels could reach 95 dBA Lmax outside the nearest townhomes if Quiet Zone status is not approved.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO ALL DEVELOPMENT PHASES.</li> <li>• The applicant shall obtain the services of an acoustical specialist to provide acoustical study and recommendations for development phases and provide the reports to the City.</li> </ul>	<ul style="list-style-type: none"> <li>• The Petaluma Building Department is responsible for review of acoustical studies and building plans to ensure measures have been incorporated.</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the building permits.</li> </ul>	<p>None required.</p>	<p>Development Phases</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<p>NOISE-2: In accordance with Mitigation Measure 10-2 of the Central Petaluma Specific Plan, require implementation of the following measures during all phases of project construction:</p> <p>a) <i>Construction Scheduling.</i> Limit noise-generating constructions activities to daytime, weekday hours (7 AM to 6 PM) and 9 AM to 5 PM on weekends and holidays. When construction is occurring within 100 feet of existing residences then construction shall be initiated no earlier than 8 AM during weekdays, 9 AM on Saturday and shall be prohibited on Sundays and Holidays.</p> <p>b) <i>Equipment.</i> Properly muffle and maintain all construction equipment powered by internal combustion engines.</p> <p>c) <i>Idling Prohibitions.</i> Prohibit unnecessary idling of internal combustion engines.</p> <p>d) <i>Equipment Locations and Shielding.</i> Locate all stationary noise-generally equipment, such as air compressors as far as practical from existing nearby noise sensitive receptors.</p> <p>e) <i>Quiet Equipment Selection.</i> Select quiet construction equipment, particularly air compressors, whenever possible.</p> <p>f) <i>Noise Disturbance Coordinator.</i> Designate a project construction supervisor as "Noise Disturbance Coordinator" who would be responsible for responding to any local complaints about construction noise. The Disturbance Coordinator would determine the cause of the noise complaint and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the Disturbance Coordinator at the construction site and submit to the City of Petaluma Building and Police Departments.</p> <p>g) <i>Notification.</i> Notify nearby residents (within 300 feet) in writing of the construction schedule.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS &amp; ALL DEVELOPMENT PHASES.</li> <li>• Measures shall be included in the Construction Specifications for grading plans, subdivision improvement plans, and grading/construction plans for subsequent development phases.</li> <li>• Applicant shall provide for periodic inspection during construction to ensure that measures are in place.</li> </ul>	<p>The Petaluma Public works Department is responsible for review of improvement plans and Building Department is responsible for review of the building plans to ensure that measures are included on construction specifications.</p>	<ul style="list-style-type: none"> <li>• Prior to the issuance of the grading permits for review of plans.</li> <li>• On-going site inspections during grading and construction, at the discretion of the City.</li> </ul>	<p>Construction Monitoring Report from Applicant that documents periodic site inspections during grading to ensure measures and verification that measures are in place.</p>	<p>Subdivision Improvements</p> <hr/> <p>Development Phases</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

Mitigation Measure	Implementation Actions	Monitoring / Reporting Responsibility	Timing Requirements	Reporting Requirements	Verification of Compliance
<b>Traffic</b>					
<p>TRAF-1: If SMART rail service (and the supplemental safety measures that may be needed for it) is delayed to such an extent that the Riverfront project is built first, require installation of the supplemental safety measures at the existing Caulfield Lane at-grade crossing to include an additional exit gate on the southwest side of the crossing to preclude vehicles from navigating around the entry gates to proceed eastbound on Caulfield. The exit gate and related items shall be installed by SMART's contractor and funded by the City. The applicant shall contribute funds equal to half the cost of construction.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS.</li> </ul>	<ul style="list-style-type: none"> <li>• The Petaluma Public Works &amp; Utilities Department is responsible design and construction of the exit gate system.</li> <li>• Applicant is responsible for payment of half the total cost.</li> </ul>	<p>Concurrent with recordation of Final Map.</p>	<p>None Required</p>	<p>Subdivision Improvements</p> <hr/>
<b>Cumulative - Traffic</b>					
<p>CUM-1. Require payment of the project's 21% pro-rata share of the cost of signalization at Hopper Street/Caulfield Lane in the future when an extension of Caulfield Lane over the Petaluma River is completed.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS.</li> <li>• City shall determine pro-rata share.</li> </ul>	<ul style="list-style-type: none"> <li>• The Petaluma Public Works &amp; Utilities Department is responsible for determining pro-rata share, and applicant is responsible for payment.</li> </ul>	<p>Concurrent with recordation of Final Map.</p>	<p>None Required</p>	<p>Subdivision Improvements</p> <hr/>
<p>CUM-2. The Applicant shall lengthen the westbound left turn pocket at Lakeville Street/Caulfield Lane to approximately 250 feet, and install a raised median on the westbound approach to physically prohibit illegal left turn movements into and out of adjacent properties, as recommended in the project traffic report, in order to improve capacity and safety at the intersection.</p>	<ul style="list-style-type: none"> <li>• Include measure as Condition of Approval. APPLIES TO SUBDIVISION IMPROVEMENTS.</li> <li>• Applicant responsible for preparation of improvement design plans, submittal to City and construction of improvement upon City review and approval.</li> </ul>	<ul style="list-style-type: none"> <li>• The Petaluma Public Works &amp; Utilities Department is responsible for review and approval of improvement plans.</li> </ul>	<p>As part of the construction of subdivision improvements.</p>	<p>None Required</p>	<p>Subdivision Improvements</p> <hr/>