

# **270 and 280 Casa Grande Road Creekwood Housing Development Project**

SCH# 2022100452

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## **Final Environmental Impact Report**

Prepared for  
The City of Petaluma  
Community Development Department



**December 2024**

Prepared by  
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### **Lead Agency**

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# **1. Introduction and List of Commenters**

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# **1. INTRODUCTION AND LIST OF COMMENTERS**

## **1.1 INTRODUCTION**

This Final Environmental Impact Report (EIR) contains agency and public comments received during the public review period of the 270 and 280 Casa Grande Road Creekwood Housing Development Project (proposed project) Draft EIR. This document has been prepared by the City of Petaluma, as Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, Section 15132. The Introduction and List of Commenters chapter of the Final EIR discusses the background of the Draft EIR and purpose of the Final EIR, identifies the comment letters received on the Draft EIR, and provides an overview of the Final EIR's organization.

## **1.2 BACKGROUND**

The Draft EIR identifies the proposed project's potential environmental impacts and the mitigation measures that would be required to be implemented. The following environmental analysis chapters are contained in the Draft EIR:

- Biological Resources;
- Greenhouse Gas Emissions;
- Hydrology and Water Quality;
- Transportation;
- Statutorily Required Sections; and
- Alternatives Analysis.

In accordance with CEQA, the Draft EIR was sent to the State Clearinghouse (SCH#: 2022100452) for distribution to State agencies on July 26, 2024, for a 45-day public review period. In addition, the Draft EIR and a Notice of Availability (NOA) for the Draft EIR were published on the City of Petaluma website. Printed copies of the Draft EIR were made available for review at the Petaluma Community Development Department (11 English Street, Petaluma, CA) and Petaluma Community Center (320 North McDowell Boulevard, Petaluma, CA).

## **1.3 PURPOSE OF THE FINAL EIR**

Under CEQA Guidelines Section 15132, the Final EIR shall consist of:

1. The Draft EIR or a revision of the Draft.
2. Comments and recommendations received on the Draft EIR.
3. A list of persons, organizations, and public agencies commenting on the Draft EIR.
4. The responses to significant environmental points raised in the review process.
5. Any other information added by the Lead Agency.

As required by CEQA Guidelines, Section 15090(a)(1)-(3), a Lead Agency must make the following three determinations in certifying a Final EIR:

1. The Final EIR has been completed in compliance with CEQA.



2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

Under CEQA Guidelines Section 15091, a public agency shall not approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects. Findings of Fact must be accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The Findings of Fact are included in a separate document that will be considered for adoption by the City's decision-makers.

Pursuant to CEQA Guidelines, Section 15093(b), when a Lead Agency approves a project that would result in significant and unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence and is subject to adoption by the City's decision-makers along with the Findings of Fact.

The 270 and 280 Casa Grande Road Creekwood Housing Development Project would result in a significant and unavoidable impact related to generating greenhouse gas emission (GHG), either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. (Impact 4.2-1); and result in vehicle miles travelled (VMT) which exceeds an applicable threshold of significance, except as provided in CEQA Guidelines Section 15064.3, subdivision (b). (Impact 4.4-3). Thus, a Statement of Overriding Considerations must be adopted if the project is approved.

## **1.4 LIST OF COMMENTERS**

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The City of Petaluma received thirty-three comment letters during the public comment period on the Draft EIR for the proposed project. The comment letters were authored by the following agencies, groups, and individuals

### **Agencies**

Letter 1 .....California Department of Transportation  
Letter 2 .....Department of Toxic Substances Control

### **Groups**

Letter 3 .....Generation Housing

### **Individuals**

Letter 4 .....Barbara Bachtell  
George Bachtell  
Trevor Durling  
R J Field  
Jean Hazelton  
Joy Koff  
Nita Krygier  
Ross LaBrier  
Victoria LaBrier



	Michelle Law
	David Levison
	Jeffrey Lyons
	Terry Newell
	Laura Scudder
	Olivia Sykes
	Christian Vasquez
Letter 5 .....	Patrica Belichick
Letter 6 (09/10/2024) .....	Jack Byrne
Letter 7 (09/16/2024) .....	Jack Byrne
Letter 8 .....	Merrill Camilleri
Letter 9 (09/03/2024) .....	Carol Crabill
Letter 10 (09/10/2024) .....	Carol Crabill
Letter 11 .....	Sara Golightly
Letter 12 .....	Jean Hazelton
Letter 13 .....	Amy Hillstead
Letter 14 .....	Brian Hillstead
Letter 15 (09/10/2024) .....	Elaine K
Letter 16 (09/16/2024) .....	Elaine K
Letter 17 .....	Joe and Teresa Lampe
Letter 18 .....	Bruce Mallon
Letter 19 .....	Micheal McBride
Letter 20 .....	Christy and Andre Owens
Letter 21 .....	Rick Parker
Letter 22 .....	Susan Price
Letter 23 .....	Caroline Purtell
Letter 24 .....	Frank Quint
Letter 25 .....	Sanatan Sahgal
Letter 26 .....	Brenten Sorensen
Letter 27 .....	Marilyn Sullivan
Letter 28 .....	Melinda and Jimmy Tran
Letter 29 .....	Megan Turrell
Letter 30 .....	Unknown
Letter 31 .....	Nicole Wehr
Letter 32 .....	Matt and Nicole Wehr
Letter 33 .....	Alicia Wolff
Letter 34 .....	PC DEIR Public Comment Memo
Letter 35 .....	CC DEIR Public Comment Memo

In addition, verbal comments were received during the public hearing held before the Planning Commission on September 10, 2024, to solicit public comments regarding the Draft EIR. A summary of the comments from the Planning Commission Draft EIR public hearing is included as Letter 34.

Additional verbal comments were received during the public hearing held before the City Council on September 16, 2024, to solicit public comments regarding the Draft EIR. A summary of the comments from the City Council Draft EIR public hearing is included as Letter 35.



## **1.5 ORGANIZATION OF THE FINAL EIR**

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The Final EIR is organized into the following chapters:

### **1. Introduction and List of Commenters**

Chapter 1 provides an introduction and overview of the document, describing the background and organization of the Final EIR. Chapter 1 also provides a list of commenters who submitted letters in response to the Draft EIR.

### **2. Responses to Comments**

Chapter 2 presents the comment letters received, responses to each comment, and includes five (5) master responses that address comments received on similar themes. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1. The response to each comment will reference the comment number.

### **3. Mitigation Monitoring and Reporting Program**

CEQA Guidelines, Section 15097, requires lead agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The intent of the Mitigation Monitoring and Reporting Program (MMRP) is to ensure implementation of the mitigation measures identified within the EIR for the Creekwood Housing Development Project.



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## **2. Responses to Comments**

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## **2. RESPONSES TO COMMENTS**

### **2.1 INTRODUCTION**

The Responses to Comments chapter contains responses to each of the comment letters submitted regarding the proposed project Draft EIR during the public review period.

### **2.2 MASTER RESPONSES**

Many of the commenters raised similar concerns regarding the proposed project. For such concerns, the City of Petaluma has prepared master responses. Through master responses, the City can address the common topics in a comprehensive manner and without duplication in the individual responses. A reference to the master response is provided, where relevant, in responses to individual comments.

#### **Summary of Master Responses**

The following is a summary of the master responses provided below:

- Master Response 1: Non-CEQA/General Comments;
- Master Response 2: Multi-Use Bridge Comments;
- Master Response 3: Casa Grande Road Comments;
- Master Response 4: Adobe Creek Riparian Corridor Comments; and
- Master Response 5: Parking Comments.

#### **Master Response 1 – Non-EIR/Administrative Issues**

CEQA Guidelines Section 15204 frames the scope and focus of review and the extent, nature, and scope of responses by a lead agency to comments on a Draft EIR, as follows:

##### **15204. FOCUS OF REVIEW**

- (a) In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.
- (c) Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert



opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

This Final EIR addresses specific comments pertaining to environmental impact analyses contained within the Draft EIR and acknowledges comments not related to environmental impact and analysis. However, a number of comments received expressed the commenter's opinion on approval or denial of the proposed project and/or general environmental concerns. The below discussion provides a response to such thematic comments, which are either too general to allow for a detailed response or unrelated to the project's impacts on the physical environment. Notwithstanding the above guidelines language, CEQA Guidelines Section 15204(e) states that such limitations should "not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

The following discussions address non-EIR/administrative issues, including comments on the merits of the proposed project, comments on potential trespassing issues associated with the off-site bridge connection over Adobe Creek, and general comments pertaining to environmental issues.

### **Comments on Merits of Project**

The environmental review process provides an impartial evaluation of the environmental impacts should a proposed project be implemented. The environmental review does not provide an opinion regarding whether the project should be approved or denied. The City of Petaluma is the public agency with land use authority and the Petaluma Community Development Department is the primary City agency providing information and recommendations on land development to the Planning Commission and City Council. The foregoing appointed and elected decision-makers weigh factors outside the scope of the EIR, including public comments, taxes, jobs, economic and social benefits, and other non-environmental factors, in considering approval/denial of a project.

Comments in general support/opposition of the project that do not convey significant environmental issues within the meaning of CEQA are hereby noted and referred to the decision-makers for consideration in their deliberations for approval or denial of the project.

Pursuant to the CEQA Guidelines, in reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. When responding to comments, lead agencies need only respond to those addressing significant environmental issues. This master response recognizes that many public comments submitted on the Draft EIR are outside of the scope of CEQA; and thus, do not require a specific response from the City. Nonetheless, this Final EIR includes all comments for the record and review and consideration by the decision-makers.

### **Comments on Potential Trespassing Issues Associated with the Off-Site Bridge Connection**

A number of comments raised concerns related to potential trespassing issues that could be precipitated through installation of the off-site multi-use (i.e., bicycle and pedestrian) bridge connection over Adobe Creek as part of the proposed project. As proposed, the bridge would be located on a City-owned parcel and connect to the proposed off-site public multi-use pathway to the west of the creek and to the existing path along Spyglass Road to the east. The project would



include dedication of a public pedestrian easement to provide access to the pathway and bridge from Casa Grande Road.

The City acknowledges the comments from the public, indicating that there have been instances where student-age kids, presumably from Casa Grande High School, have trespassed into the Adobe Creek corridor, and in some cases, engaged in illicit activities. The City also acknowledges the concerns expressed by the public that construction of the off-site multi-use bridge over Adobe Creek could increase incidents of student trespassing, and perhaps even introduce homeless encampments. While these are important considerations, there is no reasonable means by which to quantify the extent to which trespassing in the Adobe Creek corridor may increase as a result of the project's proposed bridge improvement. Any attempt to do so would be considered speculative. Some commenters have reported that student activity within the Creek corridor has resulted in one or more fire-ignitions. There is no reliable method for assessing the potential extent by which the project could exacerbate this issue, as it would require speculation as to the amount of increased trespassing incidents resulting from the bridge and the amount of illicit behavior carried out during those events.<sup>1</sup> CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Furthermore, the subject of trespassing onto City-owned property is a local law enforcement issue rather than a physical environmental impact requiring analysis pursuant to CEQA. Enforcement of laws is the responsibility of local law enforcement and any such instances within the Adobe Creek corridor should be reported to the Petaluma Police Department and handled accordingly. Additionally, the potential for trespassing and illegal activity may actually decrease with the addition of the new subdivision and bridge, as increased visibility and foot traffic could naturally deter such behavior. The social concerns expressed by the commenter are noted and have been forwarded to the decision-makers for their consideration.

### **General Comments Pertaining to Environmental Concerns**

Comments that voiced general opposition to or support for the proposed project often were combined with other general statements about environmental concerns (e.g., related to air quality, traffic, noise, etc.). According to CEQA Guidelines Section 15088, "[t]he level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment." Thus, when a commenter expresses general concerns like the proposed project would result in "more traffic", "increased traffic-safety hazards", "increased air pollution", or "increased noise", a specific response is not offered. Rather, the commenter is referred to those sections of the Draft EIR wherein the referenced general concern is evaluated in detail. For example, project-related traffic and potential traffic-safety hazards are evaluated in Chapter 4.4, Transportation; Adobe Creek, riparian habitat, and other biological resources are evaluated in Chapter 4.1, Biological Resources; greenhouse gas emissions are evaluated in Chapter 4.2, Greenhouse Gas Emissions; and runoff, flooding, and other hydrology issues are evaluated in Chapter 4.3, Hydrology and Water Quality, of the

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<sup>1</sup> See Stephen L. Kostka and Michael H. Zischke. *Practice Under the California Environmental Quality Act* (Second Edition, March 2024 Update), Section 13.26. It states, "A lead agency may determine that an impact is too speculative for evaluation after investigating whether reasonable analysis of the impact can feasibly be provided...A lead agency may also appropriately conclude that a reliable method for assessing an impact is not available."



Draft EIR. The project-related increase in air quality emissions and the related effect on the surrounding environment is addressed in Section III, Air Quality, of the Initial Study prepared for the project (see Appendix A of the Draft EIR), and potential impacts related to noise and vibration associated with construction and operation of the proposed project are addressed in Section XIII, Noise, of the Initial Study.

## **Master Response 2 – Multi-Use Bridge Comments**

A number of comments recommended alternative bridge alignments to the off-site bridge connection proposed by the project applicant and evaluated within the Draft EIR. The bridge-related comments expressed by commenters primarily focused on trespassing concerns, which are addressed in Master Response 1, recommendation of a “no bridge alternative,” and recommendation of alternative alignments for the proposed bridge.

The following master response will address these thematic comments. In addition, it is important to note that the inclusion of a multi-use bridge over Adobe Creek as part of the proposed project is a result of the feedback provided by City Council during its deliberation on the adjacent Mackenna project. In general, City Council recognized the potential value of having a bridge connection over the Creek, but without inclusion of such an improvement in the Mackenna project, expressed its desire for such an improvement to be considered should a project come forward on the Creekwood site.

### **No Bridge Alternative**

With respect to the requests to evaluate a No Bridge Alternative in the EIR, this has already been accomplished in the Draft EIR. The No Bridge Alternative is included in the Alternatives Analysis chapter of the Draft EIR (Chapter 6), starting on page 6-11. The description of the No Bridge Alternative on page 6-11 is as follows:

#### **No Bridge Alternative**

The No Bridge Alternative would include demolition of the on-site residence at 280 Casa Grande Road, retention of the existing residence at 270 Casa Grande Road, development of 59 dwelling units, construction of various on-site road and utility improvements, landscaping, and a new off-site public multi-use pathway along the west side of the Creek. However, the bridge connection over the Creek for the public multi-use pathway would not be developed under the No Bridge Alternative.

Given that the majority of on- and off-site improvements required under the No Bridge Alternative would still be developed, the Alternative would still require a Vesting Tentative Parcel Map, Site Plan and Architectural Review, and a Tree Removal Permit. In addition, because the No Bridge Alternative would generally result in similar development of the proposed project, Objectives #1 through #3, #6, and #7 would be fully met. However, because the bridge connection would not be developed Objective #4 would only be partially met, and Objective #5 would not be met.

As summarized in Table 6-1 of the Draft EIR on page 6-16, the No Bridge Alternative would result in fewer impacts related to biological resources and hydrology and water quality, as compared to the proposed project; similar impacts related to cultural resources, geology and soils, hazards and hazardous materials, noise, and tribal cultural resources; and greater impacts related to greenhouse gas (GHG) emissions and transportation.



Regarding the No Bridge Alternative's increase in impacts (compared to the proposed project) related to GHG emissions and transportation, as detailed in the Focused Traffic Study prepared for the proposed project by W-Trans (see Appendix G of the Draft EIR), improving pedestrian connectivity within and surrounding a development has been shown to reduce the amount of vehicle miles traveled (VMT) generated per capita in the area of the development. Upon completion, the Adobe Creek bridge and on-site connections provided by the proposed project would establish a new connection between Casa Grande High School and the neighborhoods to the southeast, thus shortening the walking and biking distances to the high school for many students. The bridge connection would also make use of a recently-constructed enhanced pedestrian crossing on Casa Grande Road, just west of the project site and the Mackenna subdivision. In addition to improving non-auto access to the high school, the new bridge and pathways would improve non-auto linkages among neighborhoods.

### *VMT*

A methodology, consistent with 2021 California Air Pollution Control Officers Association (CAPCOA) methodology for determining a project's VMT per capita reduction attributable to pedestrian-connectivity improvements, was used as part of the Focused Traffic Study to quantify the anticipated areawide VMT reductions projected to result from the proposed off-site bridge connection and multi-use pathway. The methodology considers several factors including but not limited to the percentage increase in the pedestrian network within a half mile of the proposed project, prior research conducted by the California Air Resources Board (CARB), site-specific estimates of the Casa Grande High School population within walking distance of the project site, and the potential for some students to walk in the future instead of driving or being dropped off by car. After adjusting to reflect annualized values (given that school is only in session for a portion of the year and some inclement weather days limit walking), the Focused Traffic Study estimated school VMT reduction to be 11 miles per day as a result of the project's pedestrian-connectivity improvements.

The proposed improvements would also be expected to reduce areawide VMT by shortening bicycling distances, improving connectivity to off-street bike facilities, and making travel by bike more appealing, resulting in an estimated reduction of 15 vehicle miles traveled per day. In total, the proposed Adobe Creek bridge is projected to reduce areawide VMT by approximately 26 miles per day through shifting existing travel patterns in the surrounding neighborhood (see Appendix G to the Draft EIR, pg. 5). Please also see Appendix A to this Final EIR.

Thus, by eliminating the bridge, the No Bridge Alternative would result in greater areawide VMT, as compared to the proposed project, which would concomitantly result in slightly greater GHG emissions and transportation impacts, as compared to the proposed project (Draft EIR, pg. 6-13).

### *Biological Resources*

With respect to biological resources, buildout of the No Bridge Alternative would avoid disturbance of the Creek, as well as potential habitats for wildlife species, including steelhead, foothill yellow-legged frog, California red-legged frog, and northwestern pond turtle, to the maximum extent feasible, by limiting disturbance within the Creeks channel. Because impacts to the Creek would be avoided, Mitigation Measures 4.1-3(a), 4.1-3(b), 4.1-3(c), 4.1-4(a) through 4.1-4(g), 4.1-7(a), 4.1-7(b), 4.1-8(a), 4.1-8(b), and 4.1-8(c) would not be required under the No Bridge Alternative. Additionally, given that the bridge connection over the Creek for the public multi-use pathway would not be developed under the No Bridge Alternative, the No Bridge Alternative would not





require the removal of 24 trees that are designated as protected by Petaluma Implementing Zoning Ordinance (IZO) Section 17.040, or the pruning of three additional protected trees located in proximity to the off-site bridge.

### *Hydrology and Water Quality*

With respect to hydrology and water quality, the Draft EIR determined (pg. 6-12) that the total disturbance area associated with the No Bridge Alternative would be slightly reduced as compared to the proposed project, and the approximately 90 cubic yards (CY) of net fill necessary under the proposed project for the abutment fill slopes would not be required. Thus, the No Bridge Alternative would slightly reduce the potential to violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality during construction as compared to the proposed project.

As stated above, and discussed in Chapter 6 of the Draft EIR, all other potential environmental impacts associated with the No Bridge Alternative would be similar to the Proposed Project.

### Alternative Bridge Alignments

Several commenters recommended that alternative alignments for the proposed bridge be considered. This response will first identify why the currently proposed location was selected. The proposed bridge location was selected by the project applicant for several reasons, such as the level grade of the landing areas on both sides of the Creek; proximity to the Makenna public path and being the geographical center between Sartori Drive and Ely Road; the bridge abutments would be located outside the effective floodway boundary and not adversely affect the upstream or downstream water surface elevations or floodplain.

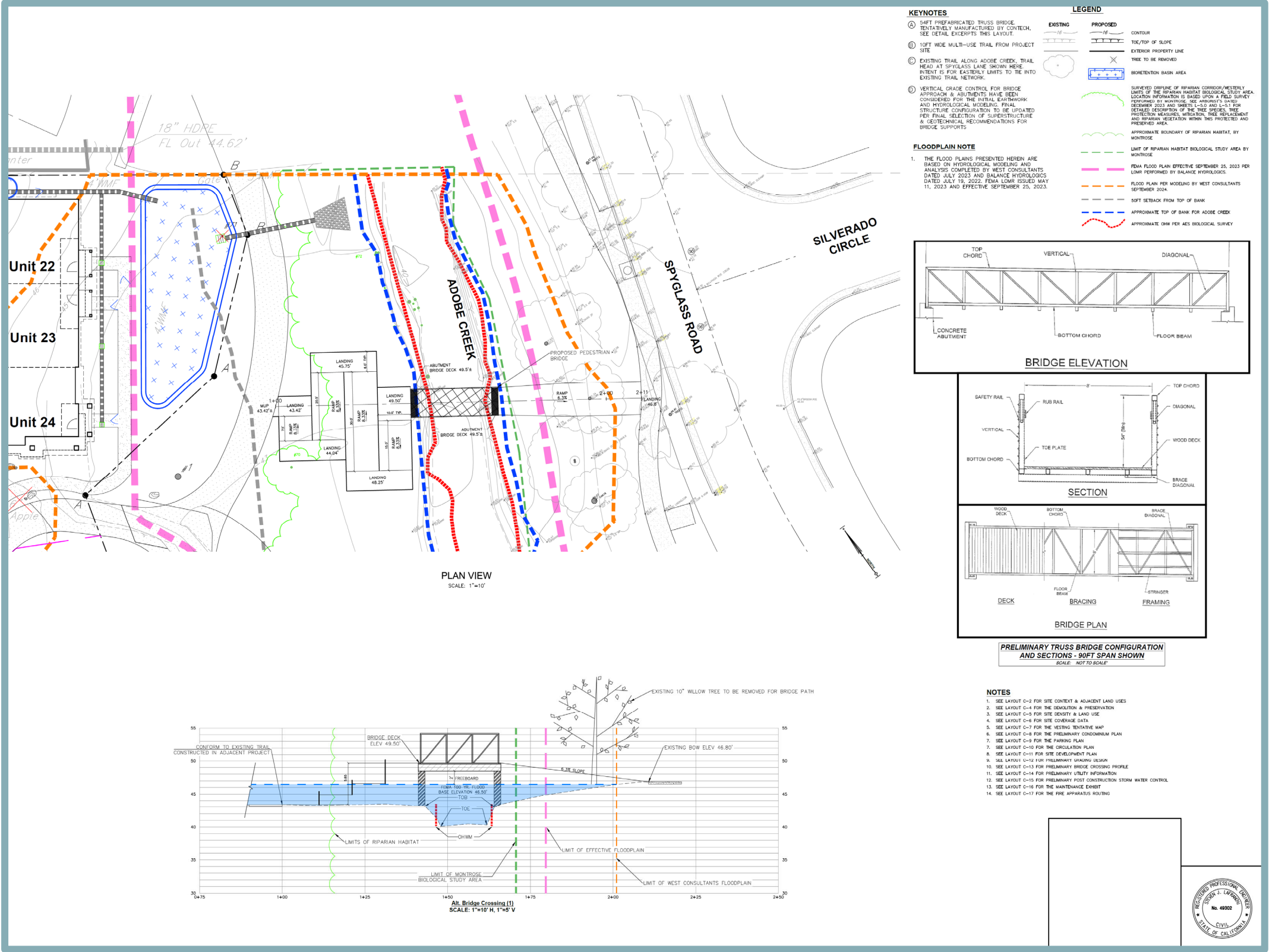
In response to the public comments, additional consideration was given to the suggested northerly alignment for the bridge, as shown in Figure 2-1. In this alternative location, the bridge would consist of a 54-foot-long prefabricated truss bridge that would connect to the proposed off-site multi-use pathway to the east of Adobe Creek and the existing path along Spyglass Road. The 54-foot-long truss bridge would be 36 feet less than the length of the proposed off-site bridge connection, which would consist of a 90-foot truss bridge. Due, in part, to its shorter alignment length, the northerly Off-Site Bridge alignment would require less removal of protected trees than the proposed project. In addition, the alternative bridge alignment would be located further from the existing private properties to the east of Adobe Creek.

However, whereas the proposed project would require a west approach elevation of 47.02 feet and an east approach elevation of 47.59 feet, the northerly Off-Site Bridge alignment would have a much greater grade difference that would require increased grading and the placement of fill within the Adobe Creek floodplain and riparian corridor. The following summarizes the challenges associated with the grade difference of a northly bridge alignment:

- Bridge Deck - The minimum freeboard (clearance) between the 100-year water surface base flood elevation and the bottom of the bridge deck (with the structural section of the bridge) must be 49.6 feet.



Figure 2-1  
Conceptual Northerly Off-Site Bridge Alternative



- **Spyglass Road Approach** - The elevation of the sidewalk on Spyglass Road is 46.8 feet. The elevation difference between the sidewalk and bridge deck is 2.8 feet. The distance between the sidewalk and the bridge is approximately 28.5 feet, creating an approach ramp with a slope of approximately 10%, and would require handrails on the ramp.
- **Project Public Path Approach** - The elevation of the proposed public path on the project side of Adobe Creek is 43.5 feet. The elevation difference between the path and the bridge deck (49.6 feet) is 6.1 feet. The distance between the proposed path and the bridge deck is 14 feet, creating an approach ramp with a slope of 44%, making this infeasible, as it would not comply with ADA requirements. Furthermore, introducing fill in this area would require substantial earthwork and the placement of fill within the flood plain to make up the 6.1-foot grade difference between the path and the bridge deck. Introducing fill of this quantity to accommodate a northerly alignment would result in greater impacts to hydrology and biological resources relative to the southern alignment, which precludes the placement of fill within the floodplain, and is therefore, not considered to be environmentally superior.

Ultimately, there are environmental trade-offs for the proposed bridge location and the northly bridge alignment shown in Figure 2-1. Whereas the proposed bridge location would minimize fill within the Adobe Creek corridor, as compared to the northerly alignment, the northly alignment is expected to require removal of fewer trees.

While two possible specific bridge locations are considered as part of the environmental review, a bridge over Adobe Creek at any location along the project site frontage would have similar environmental impacts to biological resources, VMT, GHG, and hydrology and water quality, and the extent of these impacts are fully disclosed in the EIR. Accordingly, no further analysis on the environmental impacts of alternate bridge locations is needed in the FEIR.

The City Council may consider environmental factors as well as other economic and social concerns when deliberating on the project's proposed bridge alignment.

### **Master Response 3 – Casa Grande Road Comments**

The City received several comments expressing concerns over potential traffic increases generated by the proposed project along Casa Grande Road and how said increases could affect safety along Casa Grande Road, particularly during pick-up and drop-off times associated with Casa Grande High School, which is located west of the project site, across Casa Grande Road. The consideration of a proposed development's potential to substantially increase traffic hazards due to a dangerous geometric design (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) is a question required for analysis under CEQA (see question 'c' of Section XVII, Transportation, of CEQA Guidelines Appendix G). In accordance with the foregoing requirements, the Draft EIR evaluates the potential for the proposed project to substantially increase hazards to vehicle safety under Impact 4.4-4, which starts on page 4.4-23.

As discussed therein, the proposed project would not include any new sharp curves or dangerous intersections and would not be located in the vicinity of any such existing roadway features. The proposed internal roadway and frontage improvements would be designed consistent with applicable City standards, including those set forth in Title 11, Vehicle and Traffic, of the Petaluma Municipal Code, which would be confirmed during improvement plan review. The project would also not introduce incompatible uses, such as farm equipment or heavy-duty truck traffic, to area

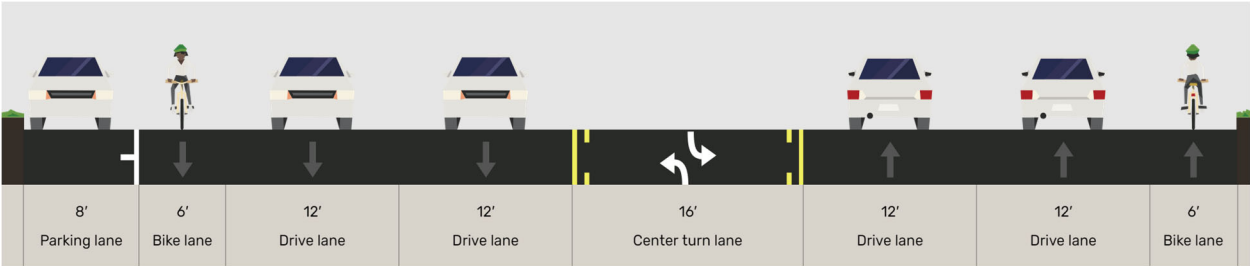




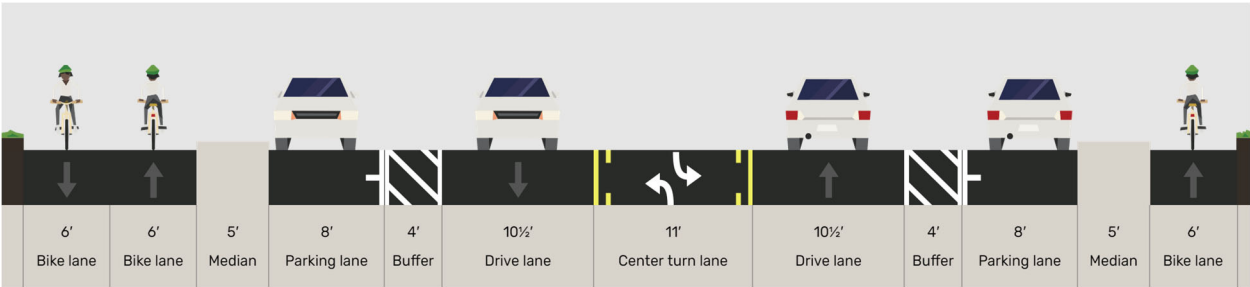
roadways during operations. The Draft EIR also found that sight distance based on the posted speed limit on Casa Grande Road is adequate in both directions at the proposed project’s driveway locations along the road. Overall, for the foregoing reasons, the Draft EIR concludes under Impact 4.4-4 that the proposed project would not substantially increase hazards to vehicle safety due to a geometric feature or incompatible uses, and a less-than-significant impact would occur. Based on the above, the Draft EIR’s analysis of potential traffic safety hazards that could occur as a result of the proposed project is adequate.

Additionally, independent of the proposed project, the City of Petaluma has already planned for future modifications to Casa Grande Road as part of the City’s Capital Improvement Program (CIP) that would improve safety by incorporating traffic-calming measures along the roadway corridor. As detailed in a Petaluma Public Works & Utilities Department (PW&U) Memorandum, which was attached to the Petaluma Planning Commission’s Staff Report to the Petaluma City Council as part of the September 16, 2024 City Council meeting (see Appendix B of this Final EIR), Casa Grande Road is tentatively scheduled for reconstruction in 2027, pending future City Council budget adoption and prioritization. More specifically, Casa Grande Road, which currently features two lanes in each direction, a two-way left-turn lane/median, unprotected Class II bike lanes in each direction, and on-street parking only along the southbound side of the road, is anticipated to be reduced to three lanes (one vehicle-travel lane in each direction and a center left-turn lane).

The cross-sections below illustrate what could be possible through reducing and narrowing vehicle lanes and reallocating that roadway width to other uses, such as on-street parking and protected bike lanes. These are for illustrative purposes only and not intended to convey an official design proposal by the City.



Existing conditions (facing northbound; school to left and project site to right)



Potential configuration with lane reduction (facing northbound; school to left and project site to right)

As shown above, PW&U anticipates that the reconfigured Casa Grande Road would feature on-street parking lanes in each direction, which would be separated from the modified vehicle-travel



lanes by a four-foot-wide buffer, and protected Class IV bike lanes in both directions, which would be separated from the planned on-street parking lanes by five-foot-wide medians. The addition of protected Class IV bike lanes in both directions would meet the National Association of City Transportation Officials' guidance for bikeways that are safe and appealing to people of all ages and ability levels, consistent with the City's Draft Active Transportation Plan. The addition of on-street parking would also provide a physical barrier separating pedestrians along the road's sidewalks and help meet the neighborhood's growing parking needs. Additionally, the City anticipates the lane reduction to reduce speeding, weaving, and other dangerous driving behavior that is more likely to occur on streets with multiple lanes in each direction.

It should be further noted that independent of the proposed project and the City's planned modifications to and traffic-calming measures along Casa Grande Road, a crosswalk with rectangular rapid-flashing beacons (RRFBs) and refuge island was installed on Casa Grande Road as part of development of the Makenna 36-unit single-family residential subdivision, which is located immediately south of the project site. Installation of the crosswalk, RRFBs, and refuge island further enhances safety along the Casa Grande Road corridor and allows for pedestrians to safely cross from one side of the road to the other.

Overall, based on the above, potential impacts associated with traffic safety hazards were adequately evaluated in the Draft EIR prepared for the proposed project and additional modifications (both those recently completed and planned for the future) would further enhance safety along Casa Grande Road.

#### **Master Response 4 – Adobe Creek Riparian Corridor Comments**

Several comments recommended that improvements be made to the Adobe Creek riparian corridor as part of the proposed project, including, but not limited to, removal of invasive plant species from within and along the creek. Such actions would require permit approvals in accordance with applicable federal and State regulations. As detailed on page 4.1-6 of the Biological Resources chapter of the Draft EIR, Adobe Creek displays a clear ordinary high-water mark (OHWM) and top of bank and, therefore, is a water of the U.S. and State that is subject to U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) jurisdiction, respectively. As discussed in the Regulatory Context section of the Biological Resources chapter, which starts on page 4.1-21, the portion of Adobe Creek below the OHWM is subject to USACE regulations established by the Clean Water Act (CWA). Discharges of dredged or fill material below the OHWM are regulated by USACE under Section 404 of the CWA. In addition, Section 401 of the CWA requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the U.S. to obtain a certification that the discharge would comply with applicable effluent limitations and water quality standards. In California, under Section 401, the State Water Resources Control Board (SWRCB) and RWQCBs are the authorities that certify that issuance of a federal license or permit does not violate California's water quality standards.

With respect to Adobe Creek enhancements that could occur above the OHWM, the California Department of Fish and Wildlife (CDFW) maintains regulatory authority over Adobe Creek, and extends out to the edge of the riparian corridor. Specifically, California Fish and Game Code (CFGF) Section 1602 requires notification to CDFW of any proposed activity that may substantially modify a river, stream, or lake, including, among other requirements, activities that could substantially change or use any material from the bed, channel, or bank of any river, stream, or lake.



The City is open to enhancements to the Adobe Creek corridor, including the removal of invasive plant species; however, such activities must be carried out in accordance with the applicable regulations established under federal and State law. The Draft EIR requires compliance with the CWA and CFGC as part of its analysis of potential impacts to biological resources protected under CEQA. The Draft EIR evaluates the potential for the proposed project to have a substantial adverse effect on riparian habitat or other CDFW-designated Sensitive Natural Communities under Impact 4.1-7, which starts on page 4.1-47. Because the proposed project would include off-site improvements within and along both sides of the Adobe Creek corridor associated with the off-site bridge connection, the Draft EIR establishes Mitigation Measure 4.1-7(a), which requires that the project applicant apply for a CFGC Section 1600 Lake or Streambed Alteration Agreement (LSAA) from CDFW and comply with the terms and conditions set forth therein. Enhancements, such as removal of invasive plant species from the creek corridor, could potentially be carried out as part of compliance with the Section 1600 LSAA. Additionally, because the Aquatic Resources Delineation (ARD) prepared for the proposed project (see Appendix C of the Draft EIR) had not yet been verified by USACE, the Draft EIR concluded under Impact 4.1-8 (see page 4.1-49) that project construction activities associated with the proposed bridge connection and stormwater outfall structures could indirectly result in impacts to the creek related to erosion and sedimentation. To address the potential impact, Mitigation Measure 4.1-8(a) of the Draft EIR requires establishment of a 50-foot setback from the Adobe Creek OHWM, prior to commencement of grading activities, and allowance of a lesser setback established from the proposed locations for the stormwater outfall facilities and off-site multi-use pathway and bridge, in coordination with applicable regulatory agencies. The measure also prohibits construction and staging of vehicles and equipment within the creek channel. Mitigation Measure 4.1-8(b) of the Draft EIR requires submittal of the ARD to USACE for verification and, if necessary, obtainment of a Section 404 permit from USACE and Section 401 water quality certification from the RWQCB. Waters of the state or U.S. that would be lost or disturbed shall be restored, replaced, or rehabilitated on a “no-net-loss” basis. Overall, through compliance with Draft EIR Mitigation Measures 4.1-7(a), 4.1-8(a), and 4.1-8(b), enhancements to the Adobe Creek corridor including invasive removal and native plantings could potentially be completed.

Regarding the comments encouraging removal of invasive plants and planting native species, while doing so within the Adobe Creek corridor is subject to regulatory agency approval, it is noteworthy that Mitigation Measure 4.1-2(b) requires inclusion of native plant species on-site within the project landscaping plan.

This response also recognizes that the City of Petaluma prepared the Adobe Creek Restoration Plan and Management Program circa 1994. The Plan is focused on restoration and management of two reaches of Adobe Creek, neither of which are adjacent to the project site. Thus, the plan is not applicable to the proposed project, and the project would not conflict with the goals and recommendations of the Adobe Creek Restoration Plan.

### **Master Response 5 – Parking Comments**

The City received several comments expressing concern that the proposed project would include insufficient parking. CEQA does not require analysis of parking capacity as part of preparation of an EIR. While the environmental checklist found in CEQA Guidelines Appendix G previously required an assessment of a project’s parking capacity, the 2010 CEQA Guidelines were updated to not include such provisions, as the environmental review process is intended to provide an impartial evaluation of the environmental impacts of a proposed project. As such, CEQA does not require consideration of parking adequacy, unless a project’s parking would result in substantial



secondary effects on the physical environment, such as spillover parking onto adjacent streets that could result in safety issues for vehicular and/or pedestrian and/or bicycle movements through the area. As such, the project proposes parking spaces on-site in compliance with the City's requirements for parking. As the project complies with the City's parking requirements, any secondary effects due to parking spillover or looking for parking are reasonably anticipated not to be significant.

As discussed in the Project Description chapter of the Draft EIR on page 3-7, the proposed 59-unit residential project would include 178 total parking spaces (as shown in Figure 3-5 on page 3-9 of the Draft EIR). A total of 83 covered parking spaces would be provided within the proposed garages. In addition, a total of 35 standard uncovered parking spaces would be provided on the driveways within Blocks 2 and 3, as well as a total of 35 compact uncovered parking spaces within the permeable areas adjacent to each driveway. A total of 17 on-street parking spaces would be provided along the main access street, east of the Block 2 units. An additional eight standard uncovered parallel parking spaces would be provided immediately south of the tri-plex units. The foregoing allocation of on-site parking would be consistent with the minimum number of parking spaces required for single-household dwellings and multiple-household dwellings set forth in Petaluma IZO Section 11.060. Compliance with IZO Section 11.060 would be ensured through the Site Plan and Architectural Review process in accordance with the provisions established by IZO Section 24.050. As such, the project proposes parking spaces on-site in compliance with the City's requirements for parking.

## **2.3 RESPONSES TO COMMENTS**

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The following 33 letters were received by the City during the public comment period for the Draft EIR. Verbal comments at the Planning Commission and City Council hearings received on the Draft EIR are summarized in Letters 34 and 35. Each bracketed comment letter is followed by numbered responses to each bracketed comment. The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project that are unrelated to its environmental impacts) are either discussed or noted for the record, as appropriate.

Each letter has been considered by the City and addressed, according to CEQA Guidelines Section 15088, prior to certification of this Final EIR.



**Letter 1**

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

**California Department of Transportation**

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660  
[www.dot.ca.gov](http://www.dot.ca.gov)



August 9, 2024

SCH #: 2022100452  
GTS #: 04-SON-2022-00919  
GTS ID: 27983  
Co/Rt/Pm: SON/116/36.299

Olivia Ervin, Principal Environmental Planner  
City of Petaluma  
27 Howard Street  
Petaluma, CA 94952

**Re: Creekwood Housing Development Project – Draft Environmental Impact Report (DEIR)**

Dear Olivia Ervin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Creekwood Housing Development Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the July 2024 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

1-1

**Project Understanding**

The proposed project is a 62-unit residential subdivision on an existing 5.2-acre site. The project includes demolition of the existing single-family residence at 280 Casa Grande Road and retention of the existing residence at 270 Casa Grande Road. The project includes construction of various on-site road and utility improvements, landscaping, and a new off-site public multi-use pathway, with a pedestrian bridge over Adobe Creek to connect with the existing Creekside path on the opposite bank.

1-2

**Travel Demand Analysis**

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

"Provide a safe and reliable transportation network that serves all people and respects the environment."





**Letter 1 Cont.**

Olivia Ervin, Principal Environmental Planner  
August 9, 2024  
Page 2

**1-2  
Cont.**

The project VMT analysis and significance determination are undertaken in a manner consistent with the City of Petaluma's adopted VMT policy. Per the DEIR, the proposed project would have a significant and unavoidable VMT impact. Caltrans commends the City for developing a mitigation program as part of the General Plan Update that allows projects with limited on-site VMT reduction options to reduce VMT to a sufficient level by contributing to off-site VMT mitigation measures.

Please consider the following additional measures to further mitigate the project's VMT impact.

**1-3**

- Provide Electric Vehicle Charging Infrastructure
- Implement Market Price Public Parking (On-Street)
- Provide Secure Bike Parking
- Provide Traffic Calming Measures

**1-4**

**Construction-Related Impacts**

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

**1-5**

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner via [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,



YUNSHENG LUO  
Branch Chief, Local Development Review  
Office of Regional and Community Planning

c: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment."



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## **LETTER 1: YUNGSHENG LUO, CALIFORNIA DEPARTMENT OF TRANSPORTATION**

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### **Response to Comment 1-1**

The comment is an introductory comment and does not address the adequacy of the Draft EIR.

### **Response to Comment 1-2**

The comment does address the adequacy of the Draft EIR, as the comment includes a commendation of the mitigation measures included therein that address VMT, as discussed on page 4.4-22 of the Draft EIR. The comment has been noted for the record and provided to the decision-makers for their consideration.

### **Response to Comment 1-3**

As discussed on page 4.4-22 of the Draft EIR, the proposed project already implements several CAPCOA strategies through its design, including strategies related to Density (T-1), Inclusionary Housing (T-4), and Pedestrian Network Improvements (T-18). Additional CAPCOA strategies appropriate for residential land use were considered but were ultimately determined to be infeasible or provide minimal benefit. The proposed density and bridge connection are proven, effective measures at reducing VMT for people living, working, and visiting areas of Petaluma due to the location and characteristics of the proposed project and project site.

With respect to traffic calming, please see Master Response 3.

The comment suggests additional VMT reduction measures for consideration. These additional measures are provided to the decision-makers for their consideration.

### **Response to Comment 1-4**

The comment provides background information regarding California Department of Transportation (Caltrans) permit requirements, and does not specifically address the adequacy of the Draft EIR.

### **Response to Comment 1-5**

The comment does not address the adequacy of the Draft EIR.



**Letter 2**



**SENT VIA ELECTRONIC MAIL**

August 8, 2024

Olivia Ervin  
Principal Environmental Planner  
City of Petaluma Planning Division  
11 English Street  
Petaluma, CA 94952  
[oervin@cityofpetaluma.org](mailto:oervin@cityofpetaluma.org)

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CREEKWOOD HOUSING  
DEVELOPMENT PROJECT DATED JULY 25, 2024, STATE CLEARINGHOUSE  
NUMBER [2022100452](#)

Dear Olivia Ervin,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the Creekwood Housing Development Project (Project). The proposed Project includes demolition of the on-site residence at 280 Casa Grande Road, retention of the existing residence at 270 Casa Grande Road, and development of 62 new residential dwelling units and associated improvements. In addition, the Project would include construction of various on-site road and utility improvements, landscaping, and a new off-site public multi-use pathway, with a pedestrian bridge connection over Adobe Creek. The Project requires City approval of a Vesting Tentative Parcel Map, Site Plan and Architectural Review, and a Tree Removal Permit. In addition, the Project is expected to require Federal Emergency Management Agency approval of a Conditional Letter of Map Revision, California Department of Fish and

**2-1**





**Letter 2 Cont.**

Olivia Ervin  
August 8, 2024  
Page 2

**2-1  
Cont.**

Wildlife approval of a 1600 Lake and Streambed Alteration Agreement, and Regional Water Quality Control Board approval of National Pollutant Discharge Elimination System Phase II MS4.

**2-2**

DTSC recommends and requests consideration of the following comments:

1. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#) approved thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.

**2-3**

2. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.

**2-4**

3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional



**Letter 2 Cont.**

Olivia Ervin  
August 8, 2024  
Page 3

**2-4-  
Cont.**

information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

**2-5**

4. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's PEA Guidance Manual](#).

**2-6**

DTSC appreciates the opportunity to comment on the Creekwood Housing Development Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

*Tamara Purvis*

Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)



**Letter 2 Cont.**

Olivia Ervin  
August 8, 2024  
Page 4

cc: (via email)

Governor's Office of Planning and  
Research State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

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## **LETTER 2: TAMARA PURVIS, DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

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### **Response to Comment 2-1**

The comment summarizes the proposed project and does not address the adequacy of the Draft EIR.

### **Response to Comment 2-2**

Please refer to the Phase I Environmental Site Assessment (ESA) prepared by Montrose Environmental Solutions, included as Appendix C to the Initial Study (IS) prepared for the proposed project. As discussed therein, Recognized Environmental Conditions (RECs) of any kind were not identified on-site. A history of orchards, row crops, or other related agricultural uses is not associated with the project site; rather, the site has been used for minimal livestock grazing to assist the property owners with general upkeep and weed abatement. In addition, according to the property owner, whose family has owned said property since the early 1950's, other than livestock grazing, approximately 2-3 acres of the property were used to grow oat hay. The property owner has no record of pesticides ever being applied to the oat hay crop. Therefore, there is no substantial evidence to warrant further investigation of on-site soils for the potential presence of organochlorine pesticides.

### **Response to Comment 2-3**

Please refer to the Phase I ESA prepared by Montrose Environmental Solutions, included as Appendix C to the IS prepared for the proposed project. As discussed therein, RECs were not identified on-site. However, given the age of the on-site structure to be demolished, lead-based paint (LBP) and asbestos could be present. In addition, well and septic systems are located on site which will require appropriate abandonment. Mitigation measures IX-1 through IX-4 ensure these existing conditions are adequately addressed.

### **Response to Comment 2-4**

As noted on page 3-13 of the Draft EIR, the proposed project would require 90 CY of net fill for the abutment fill slopes, including 78 CY placed below the 100-year floodplain base flood elevation. The comment requests testing of fill soil to ensure contaminants of concern meet screening levels. The testing of fill material is a standard condition of approval applied to development projects in the City.

### **Response to Comment 2-5**

See Response to Comment 2-3.

### **Response to Comment 2-6**

The comment does not address the adequacy of the Draft EIR.



**Letter 3**



427 Mendocino Ave, Suite 100  
Santa Rosa, CA 95404

(707) 900-4364  
info@generationhousing.org

September 9, 2024

Petaluma Planning Commission  
11 English St.  
Petaluma, CA 94952

**RE: Support for Creekwood Housing Project**

Dear Chair Mozes, Commissioners, and staff:

I am writing on behalf of Generation Housing to share our endorsement and strong support for the Creekwood housing project. This project presents an excellent opportunity to add much-needed housing in an area surrounded by existing residential communities. More importantly, it offers a housing typology that addresses a significant gap in the regional housing supply—housing that is accessible to young families and workforce members seeking homeownership.

Creekwood's proposed duets and townhomes represent a typology that is essential for fostering a more inclusive housing market. These "missing middle" homes provide a much-needed stepping stone for first-time homebuyers, especially young families who wish to plant their roots in Petaluma and provide stability for their children, including those who may attend Casa Grande High School.

**3-1**

In addition to providing diverse housing options, Creekwood emphasizes creating meaningful connections within the community. The project includes a multi-use pathway adjacent to Adobe Creek, which will link the new homes to the Makenna Subdivision to the south and the Casa Grande Senior Apartments to the north. This pathway, along with the proposed pedestrian bridge over Adobe Creek, will create new opportunities for healthy outdoor exercise, while fostering stronger community connections by linking existing residential areas on Spyglass Road and beyond. This type of thoughtful planning demonstrates the developer's commitment to enhancing Petaluma's livability and walkability while encouraging active lifestyles.

We are also particularly excited about the partnership between the developer and the Housing Land Trust of the North Bay. This collaboration will ensure that 9 of the homes are set aside for affordable housing, with 5 homes reserved for low-income households and 4 for moderate-income households. In a time of increasing housing costs, this partnership helps provide a path to homeownership for residents who might otherwise be priced out of the market, making a real difference for families who want to stay in or move to the community.

In conclusion, we believe that Creekwood represents a thoughtful, well-planned addition to Petaluma's housing stock. Its focus on housing typologies that are

[www.generationhousing.org](http://www.generationhousing.org)





**Letter 3 Cont.**



427 Mendocino Ave, Suite 100  
Santa Rosa, CA 95404

(707) 900-4364  
info@generationhousing.org

**3-1  
Cont.**

accessible to a broader range of residents—particularly young families and workforce members—makes it an invaluable asset to Petaluma's long-term health and vitality.

We urge you to support this project and help Petaluma take another step toward addressing our housing needs.

In partnership,

Calum Weeks

Policy Director, Generation Housing

[www.generationhousing.org](http://www.generationhousing.org)



## **LETTER 3: CALLUM WEEKS, GENERATION HOUSING**

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### **Response to Comment 3-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.



*Also sent via email*

**Letter 4**

September 13, 2024

Dear Members of the Planning Division and City Council of Petaluma

**4-1**

The purpose of this letter is to express our concerns about the Creekwood Housing Development proposal for 59 dwelling units that you are considering for 270 & 280 Casa Grande Road. All the signers live within the 1000-foot Notification Area per your map. Our concerns follow:

**4-2**

Environmental:

**4-3**

1. Noise pollution: What will be the impact during and post construction?
2. Congestion: Will the additional traffic in the area create more congestion? Can you confirm that there will be no lane reduction on Casa Grande Road? What will be the impact of the increased foot traffic along Adobe Creek, environmental and otherwise?

**4-4**

3. Aesthetics: Does this development comply with all existing zoning and density regulations or were some invented to allow for 59 units squeezed into the available space? Has the Architectural Review been conducted and has it approved the proposed building design? Have any changes been suggested to require the dwellings to have some architectural authenticity – that is, the principle that a building should connect with its environment and culture. Has there been any reconsideration of the 3-story tri-plex units on Parcel 1?

**4-5**

4. Sewage: What will be the effect of the increased sewage production on the city's current system?

**4-6**

5. Water: Will increased water demand affect the city's ability to provide water for its residence during drought years?

**4-7**

Affordability:

1. Who is your constituency? Is there a demand for tri-plex and duplex configurations?
2. We assume that the bare minimum of 15% for inclusionary housing for affordable and low-income housing will be met. As others have noted, Petaluma is experiencing the negative effects of the lack of affordable housing. Could the percentage be increased to a greater extent, say 25%?
3. Is this development really needed? Or is profit the motivation?

Longevity:

1. What is the plan to maintain the housing development? Will there be homeowners' fees that will keep the landscaping, fencing, and exteriors functioning and attractive?

We look forward to a timely response to our concerns listed above.

Thank you,


Concerned Citizens

Signatures Attached:



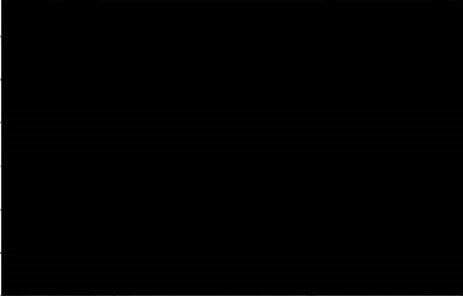


Letter 4 Cont.

Name	Address
Trava Dorling	
Barbara Bachtell	
George Bachtell	
Christopher Vazquez	
R. J. Fuller	
Tony Newell	
Nita Kryqier	
Laura Scudder	
Michelle Lawmeyer	



Letter 4 Cont.

Name	Address
DAVID LEVICH	
Jeffrey Lyons	
Jean Hazen	
Ross Labrier	
Victoria LaBrier	
Jay Koff	
Olivia Sykes	



## **LETTER 4: CONCERNED CITIZENS**

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### **Response to Comment 4-1**

The comment is an introductory comment and does not address the adequacy of the Draft EIR.

### **Response to Comment 4-2**

The comment does not specifically address the adequacy of the Draft EIR. See Master Response 1. Potential impacts related to the generation of substantial noise are evaluated under question XIII-a of the IS prepared for the proposed project. As discussed therein, noise associated with operation of the proposed residences and traffic generated by residents would not generate a substantial permanent increase in ambient noise levels in the project vicinity. However, temporary noise level increases during project construction could be significant. Thus, the IS includes Mitigation Measure XIII-1, which would ensure that project construction activities incorporate standard noise control measures.

### **Response to Comment 4-3**

The comment does not specifically address the adequacy of the Draft EIR. See Master Response 1. As discussed on page 4.4-7 of the Draft EIR and pursuant to CEQA Guidelines Section 15064.3, VMT is the primary metric used to identify transportation impacts. VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. VMT does not directly measure traffic operations, including congestion and roadway condition.

In addition, Master Response 3 addresses safety concerns related to Casa Grande Road, and Master Response 4 addresses potential environmental impacts to the Adobe Creek riparian corridor.

### **Response to Comment 4-4**

The comment does not address the adequacy of the Draft EIR. See Master Response 1. As discussed under question I-c on page 28 of the IS prepared for the proposed project, the project would be consistent with the uses allowed in the Medium Density Residential land use designation and the R4 zoning district. Pursuant to the City's General Plan, the Medium Density Residential designation provides for a variety of dwelling types, including single-family and multi-family housing, and allows for a density ranging from 8.1 to 18.0 dwelling units per acre (du/ac). The project would result in a density of 15.22 du/ac. In addition, single-family and multi-family residences are both permitted uses within the R4 zone. The proposed dwelling units would be required to be designed in accordance with the R4 Zone Development Standards set forth in Table 4.9 of IZO Section 4.040, including the City's standards for lot size, setbacks, and height limits (which include 35 feet for principal buildings, 25 feet for accessory structures, and 21 feet for accessory dwellings). Site Plan and Architectural Review would be conducted as part of the Planning Commission review of the proposed project and further address community concerns regarding aesthetics.

### **Response to Comment 4-5**

The comment does not specifically address the adequacy of the Draft EIR. See Master Response 1. Potential impacts related to sanitary sewer conveyance and treatment are evaluated under questions XIX-a through XIX-c on pages 97 and 98 of the IS prepared for the proposed project. As discussed therein, the proposed project would be provided with sanitary sewer conveyance service by the City of Petaluma through new connections to the existing sewer main in Casa Grande Road. Consistent with the City of Petaluma Sewer System Design and Construction



Guidelines, a new eight-inch sewer line would be extended into the project site. In addition, based on the 1.7 million gallons in available treatment capacity remaining at the City's treatment facility, the City's wastewater infrastructure and treatment facility would be sufficient to accommodate the increased demand generated by the project.

#### **Response to Comment 4-6**

The comment does not specifically address the adequacy of the Draft EIR. See Master Response 1. Potential impacts related to the City's ability to have sufficient water supplies available to serve the project during dry and multiple dry years are evaluated under questions XIX-a through XIX-c on pages 96 and 97 of the IS prepared for the proposed project. As discussed therein, the City, in its Urban Water Management Plan, anticipates a surplus of water supplies during a single dry year in 2025 and anticipates meeting its projected demand in every year from 2025 to 2045 in multiple dry year scenarios. However, the City could experience a shortfall of water supply during single dry year scenarios from 2030 to 2045. At such a time, the City would enact its Water Shortage Contingency Plan to reduce customer demand, and appropriate water shortage response actions would be taken to ensure demand does not exceed supply during a water shortage scenario. Therefore, the City would have sufficient water supplies to serve the proposed project during normal, dry, and multiple dry years.

#### **Response to Comment 4-7**

The comment does not address the adequacy of the Draft EIR, but expresses concerns regarding the affordability and maintenance of the proposed project. The project as proposed meets the City's Inclusionary Housing Ordinance as it provides 15% of the onsite units as affordable. Please see Master Response 1.



**Letter 5**

**From:** [Patricia Belichick](#)  
**To:** [- City Clerk](#)  
**Subject:** Creekwood Housing Development--COMMENTS FROM SPYGLASS ROAD RESIDENT  
**Date:** Sunday, September 15, 2024 12:39:37 PM

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

5-1

Hello City Clerk of Petaluma,

As a resident of Spyglass Road, I walk w/ my dog, 3-4 times daily throughout the Spylgass Road, Silverado Circle, Ely, Frates Road, Satori, Del Oro, Del Rancho, Casa Grande Road, & path along Adobe/Casa Grande Creek.

The debris, litter & trash humans leave along the streets & path make this scenic environment very unpleasant & appears disregarded. It should be a valued greenbelt and preserved by the City of Petaluma.

5-2

I've read a bridge over the creek is considered in the plan but advise IT DOES NOT OCCUR since this corridor is FILLED WITH WILDLIFE. I have observed: Skunks, Possums, Foxes, Deer, Owls, Hawks, Ducks, Squirrels, Salamanders, Lizards, Mice, Rats, and other small creatures. The photo below is a Great Horned Owl which I have seen repeatedly over the past year. Wildlife Rescue rehomed 2 fledging's here on Spyglass Road from the Casa Grande Campus in 2023 after the nest fell from a tree.

5-3

An Adobe/Casa Grande Creek study discovered fish in the creek. Reference link here & excerpt printed below: [https://en.wikipedia.org/wiki/Adobe\\_Creek\\_\(Sonoma\\_County,\\_California\)](https://en.wikipedia.org/wiki/Adobe_Creek_(Sonoma_County,_California))

5-4

If more people walk through via a bridge, only more debris, litter & trash will pollute the creek. As it exists now: a pristine wildlife enclave, it should continue to thrive in this suburban setting without negative human impact, instead it should be valued, enhanced & protected.

The City of Petaluma should responsibly care for this WILDLIFE CORRIDOR. The City of Petaluma should reject spending money on a bridge & instead use the funds to maintain & improve the existing pathways as they flow south toward the Petaluma River.

Sincerely,  
Patricia Belichick  
[REDACTED] Petaluma, CA  
[REDACTED]



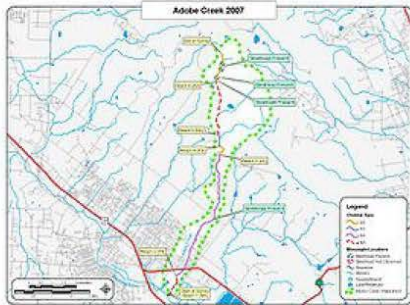


**Letter 5 Cont.**



[https://en.wikipedia.org/wiki/Adobe\\_Creek\\_\(Sonoma\\_County,\\_California\)](https://en.wikipedia.org/wiki/Adobe_Creek_(Sonoma_County,_California))

**Ecology**



Adobe Creek 2007 Steelhead Trout Biosurvey



**Letter 5 Cont.**

In 1983 a high school student group organized by school instructor Tom Furrer founded United Anglers of [Casa Grande High School](#) to restore Adobe Creek stream habitat and to see if they could restore [steelhead trout](#) (*Oncorhynchus mykiss*) populations. At that time Adobe Creek was considered a "dead stream" and was a dry, littered riverbed most of the year, although tiny steelhead trout could be found in occasional shallow, drying pools.<sup>[5]</sup> The students hauled truckloads of trash out of the creek and planted thousands of [Coast Douglas-fir](#) (*Pseudotsuga menziesii*) and [willow](#) (*Salix*) trees to shade and cool the waters. They successfully lobbied Petaluma City Hall officials to re-open Lawler Dam, which was hardly used and kept water from the creek much of the year. In October 1992 Adobe Creek was restored as a free-running stream for the first time in 8 decades. The next year, hundreds of steelhead fingerlings were counted in Adobe Creek and the native steelhead population has recovered without restocking.<sup>[5][6]</sup> Genetic analysis has proved the steelhead trout (*Oncorhynchus mykiss*) spawn and rear in the Petaluma River watershed are wild, not hatchery, stock.<sup>[7]</sup> In 1990, five [Chinook salmon](#) (*Oncorhynchus tshawytscha*) returned to spawn in Adobe Creek, the first time documented in a century.<sup>[8]</sup> In 1993 the organization constructed a salmon hatchery at the high school. In 1996, the creek was the subject of a habitat restoration project which built a step pool near Adobe Road for the benefit of migratory fish.<sup>[9]</sup> In 2001, students studied the creekbed during low summer flows, and made the scientific discovery that Steelhead fry spend the summer in the creek substrate, re-emerging when flows become reestablished.<sup>[8]</sup> In 2002, a record 74 Chinook salmon return to spawn along with native Steelhead trout who continue to use the creek annually



## **LETTER 5: PATRICIA BELICHICK**

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### **Response to Comment 5-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1, as litter is not a CEQA issue.

### **Response to Comment 5-2**

Please see Master Response 2 and Master Response 4. Wildlife is addressed in Chapter 4.1, Biological Resources, of the Draft EIR.

### **Response to Comment 5-3**

Please see Master Response 4.

### **Response to Comment 5-4**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1, 2, and 4.





**Letter 6**

**From:** Jack Byrne  
**Sent:** Tuesday, September 10, 2024 12:02 AM  
**To:** [uorozco@cityofpetaluma.org](mailto:uorozco@cityofpetaluma.org)  
**Subject:** COMMENT ON CREEKWOOD HOUSING DEVELOPMENT – Draft Environmental Impact Report

Attn: Uriel Orozco

Per "Notice of Public Hearing" instructions mailed to us on Creekwood Housing Development, I am sending this "Comment via E-mail prior to 4PM on the date of the hearing" scheduled for Sept 10<sup>th</sup>. \*\*

<beginning of comment>

**COMMENT ON CREEKWOOD HOUSING DEVELOPMENT – Draft Environmental Impact Report**

6-1

In reviewing 4.4-2 Impact on page 2-32: No mitigation is proposed. It's unacceptable that no improvement is required or planned for transit service in the area, while the city Staff and Planning Commission encourage & propose reduced parking for this Creekwood proposal.

6-2

I don't think Staff takes to heart the Blue Zone objectives and the long-term health of neighborhoods, and have not adequately identified & examined the downsides arising from "reduced parking" developments like the proposed. Do you really expect working people to commute to work with transit times of up to 1 to 2-1/2 hours per trip if parking and cars are "restricted"? This isn't a downtown dense walk-to-employment area – it's the edge of the City.

- If proposed residents must do these long commute times, I believe you have not adequately evaluated the impact on family & neighborhood health of 2-5 daily hours of family absence while commuting. How do you evaluate this impact in order to propose reduced parking, and what are your findings? You are designing the future mental health of Petaluma.
- Have you evaluated the alternative – that residents will use cars and have to park in adjacent neighborhoods? Have you even studied the impact of past "reduced parking" decisions? You don't have to look far. There is even less parking per unit calculated for in the Creekwood proposal than in the adjacent and recently completed Casa Grande Subdivision on Del Rancho Way (which was reduced parking), which provides an excellent example of past city decisions. The Casa Grande Subdivision residents end up parking in their adjacent neighborhood to the South, and are you aware this "domino overflow parking affect" is increasing friction between the two neighborhoods? That indicates that reduced parking for Creekwood will worsen conditions and further increase neighborhood vs neighborhood friction. Are city Staff instructed to identify & explore these impacts on neighborhood health – or just instructed to encourage reduced parking and more density? (Note - this is not my imagination as city Staff are on record on other subdivision proposals to request reduction of parking spaces – not so that alternative space amenities are added, but just to reduce parking – e.g. see \*)

6-3

If this development proposal moves forward, please expect that I and others will be asking the city Staff to identify and examine the full impact of reduced parking provisions, instead of just pursuing a single-sided direction without regard to future neighborhood and City health. I look forward to a productive and beneficial discussion for a healthy Petaluma.

Jack Byrne

[REDACTED]  
Petaluma, CA 94954  
[REDACTED]

Footnote...

\*500 Hopper, 2/22/22 Study Session Report stated "• There should be fewer parking spaces per unit; • There is too much street parking".

<end of comment>

\*\*In preparing these comments, I saw other online mention of a deadline of 5PM on 9/9, which is in conflict with the "4PM day of hearing deadline" in the 8/30 notice we received in the mail. Please accept this comment as officially received in time.



## **LETTER 6: JACK BYRNE**

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### **Response to Comment 6-1**

As discussed on page 4.4-20 of the Draft EIR, Petaluma Transit currently provides transit service in the project area and would be available to serve residents of the proposed project. In addition, bus stop improvements, including a new transit shelter, were recently completed at the existing bus stop on Casa Grande Road, further supporting the transit facilities accessible to the project site. A focused traffic study prepared by W-Trans (Appendix G to the Draft EIR) determined the existing transit service would be able to accommodate project-generated transit trips. Please see Master Response 5 with respect to parking.

### **Response to Comment 6-2**

Please see Master Response 5 with respect to parking.

### **Response to Comment 6-3**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1 and Master Response 5 related to parking.



**Letter 7**

**From:** Jack Byrne <[REDACTED]>  
**Sent:** Monday, September 16, 2024 5:47 PM  
**To:** Orozco, Uriel <[uorozco@cityofPetaluma.org](mailto:uorozco@cityofPetaluma.org)>  
**Subject:** RE: COMMENT ON CREEKWOOD HOUSING DEVELOPMENT – Draft EIR

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---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM  
OUTSIDE OUR EMAIL SYSTEM.---  
Attn: Uriel Orozco  
I am sending this "[Comment via E-mail prior to the 9/16 Council session.](#)"

<beginning of comment>

**COMMENT ON CREEKWOOD HOUSING DEVELOPMENT – Draft EIR**

7-1 I and MANY neighbors support additional housing in this area. However, there are serious problems evident at this environmental stage for the Creekwood project as proposed.

**PROPOSED BRIDGE**

7-2

- The proposed Adobe Creek bridge location would direct & funnel a large amount of pedestrian traffic (a lot of high school students) onto existing pathways and sidewalks of the Casa Grande Subdivision (CGS, Del Rancho Way) which were not designed or built for this volume – but built just for a short circular walk in this 36-home subdivision around the built basin. The existing CGS pathway is not even wide enough for a bicycle to pass a single pedestrian – and is closely bounded by trees and a sharp slope drop-off. So widening the CGS existing path would require extensive cost and environmental impact IN ANOTHER EXISTING SUBDIVISION from tree removal, slope impact, etc. – not to mention dramatically changing the original pathway design & neighborhood impact.

7-3

- We do not see any pedestrian traffic projections for the proposed bridge, especially at peak school times, and do not know if the proposed bridge would handle the Casa Grande High School traffic volume evident on Ely today. We have serious concerns around maintenance, littering, adequate safe lighting and other safety concerns for a proposed bridge-pathway.

7-4 **PLEASE EITHER UTILIZE THE “NO BRIDGE” OPTION OR PUT THE BRIDGE WHERE PEDESTRIAN TRAFFIC WILL NOT BE DIVERTED TO THE UNDERSIZED CASA GRANDE SUBDIVISION.**

**SAFETY & PARKING**

7-5 Casa Grande Road may have only a 10,000 traffic count, but it is highly problematic at peak before and after school times at Casa Grande High School. Left turns into – or out of – our neighborhood are almost impossible to make with a single open center lane due to CGHS traffic overloads with the existing school design. I don't believe the preliminary 2027 plans yet take peak demands and localized tight entry-exits into account. **SO MORE LOCAL PEDESTRIAN AND VEHICLE ENTRY-EXIT SAFETY CONSIDERATION IS REQUIRED FOR CASA GRANDE ROAD.**



**Letter 7 Cont.**

**7-6**

**BLUE ZONES – Creating a future problem?**

I don't think City leadership and staff sufficiently take to heart our Blue Zone objectives and the long-term health of neighborhoods, and have not adequately identified the downsides arising from "reduced parking" developments like the proposed. This isn't a downtown dense walk-to-employment area – it's the edge of the City. Have you studied the impact of your past direction to Staff on reduced parking, and their encouragement, on local neighborhoods? You have a great example – already the newer Casa Grande Subdivision residents are parking in the Del Oro neighborhood to their South. This "domino overflow parking affect" is increasing friction between the two neighborhoods. Creekwood is proposed with even less parking density than Casa Grande Subdivision, indicating that conditions will worsen.

**TO AVOID CREATING NEIGHBORHOOD FRICTION AND HURTING MENTAL HEALTH, PLEASE INSTRUCT STAFF TO ENSURE ADEQUATE PARKING FOR THIS EDGE-OF-TOWN DEVELOPMENT – AND NOT JUST CASA GRANDE ON-STREET PARKING REQUIRED BY SCHOOL NEEDS THAT ARE NOT ADEQUATELY MET.**

I look forward to a productive and beneficial discussion for a healthy Petaluma.

Jack Byrne

██████████  
Petaluma, CA 94954  
██████████



## **LETTER 7: JACK BYRNE**

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### **Response to Comment 7-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 7-2**

Please see Master Response 1, which includes sections on comments related to the merits of the project as well as comments on potential public pedestrian access.

### **Response to Comment 7-3**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1. In addition, please see Master Response 2 related to the multi-use bridge.

### **Response to Comment 7-4**

The comment expresses a preference for the No Bridge Alternative and does not specifically address the adequacy of the Draft EIR. Please see Master Responses 1 and 2.

### **Response to Comment 7-5**

Please see Master Response 3 regarding Casa Grande Road.

### **Response to Comment 7-6**

The comment does not address the adequacy of the Draft EIR. With respect to parking, please see Master Response 5.





**Letter 8**

**From:** Merrill Camilleri <[REDACTED]>  
**Sent:** Thursday, September 5, 2024 6:06 PM  
**To:** Orozco, Uriel <[uorozco@cityofpetaluma.org](mailto:uorozco@cityofpetaluma.org)>  
**Subject:** Creekwood Housing Question

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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OUTSIDE OUR EMAIL SYSTEM.---

**8-1**

The new development that was built next to this proposed project had already encroached on the habitat near the creek. We know there are red foxes living right behind this space. Can you confirm how they were considered in this proposal?

Thank you!  
Sent from my iPhone





## **LETTER 8: MERRILL CAMILLERI**

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### **Response to Comment 8-1**

Please see Master Response 4. The biological resources analysis contained in the Draft EIR appropriately evaluates special-status species. Red fox in Sonoma County are not native to California, nor are they considered special-status, warranting consideration pursuant to CEQA. Nevertheless, the comment has been forwarded to the decision makers for their consideration.



**Letter 9**

**From:** Carol Crabill  
**Sent:** Tuesday, September 3, 2024 2:44 PM  
**To:** Greg Powell <gpowell@cityofpetaluma.org>; Orozco, Uriel <uorozco@cityofpetaluma.org>  
**Subject:** EIR comment

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- 9-1** Environmental Impact Reports should include the impact on humans.  
The proposed development project Creekwood includes a row of three-story condos abutting the PEP senior housing Casa Grande Apartments. The three-story condos will cast a shadow over the seniors' gardens and apartments in winter, if not more of the year.
- 9-2** Traffic is a major concern. Especially during the school year, at drop-off and pick-up times at the high school, Casa Grande Rd. is chaotic. People who live on the new street Del Rancho Way have the option of entering and exiting from Del Oro Circle to Sartori Drive. The new street created with Creekwood will be U shaped and all traffic will come and go through Casa Grande Rd. Those who live in Casa Grande Apartments are concerned about getting into and out of their parking lot. Traffic during emergencies, such as wildfire or earthquake, would seem to be especially troublesome. If an emergency happened during school hours, the traffic issues would multiply.
- 9-3** The ostensible primary reason for the Creekwood development is the lack of housing, and especially the lack of affordable housing in Petaluma. And yet, the homes in the adjacent project, the McKenna subdivision by DeNova Homes on Del Rancho Way, presumably built for the same reason, sold for nearly \$1 Million.  
At the June so-called Neighborhood Meeting held by the developers of Creekwood, Falcon Point Associates of Pleasant Hill, they could not give those who attended even rough estimate prices for their 59 planned units, some of which will be "affordable", others will sell at "market price".  
Why cram so many people into such a small space, 5 plus acres? For the developers and landowner it is money. But what is the gain for the City of Petaluma?  
Even The Grove apartment complex at Frates and Ely has open space, grassy areas and shade. What will these new Creekwood 59 units look like should you walk down the street? Walk down Del Rancho Way to get a good idea and see how hot it is on a warm day, how crammed together the houses are with no room for parking or even garbage cans. See how unattractive that expensive development is. Check out the supposed community area behind the McKenna development and note the "hole", which is what, I'm told, the Del Rancho neighbors call it. Several trees were removed prior to the development of McKenna.
- 9-4** It appears from the EIR that tree removal for Creekwood will be minimal. However, I did note that the oak tree on the PEP property next to the sidewalk on Casa Grande Rd. appears to be marked with a red dot. So, perhaps it will be removed? A number of the PEP property's oak trees on the fence line have branches that cross the fence. Hopefully, cutting off branches on one side of the trees will not unduly impact the health of the trees.
- 9-5** Adobe Creek runs behind the proposed Creekwood development. The creek has created a fragile riparian area and is a refuge for birds and other small animals, such as foxes. These will undoubtedly be impacted by 59 new housing units. And the residents will not have the benefit of hearing the songbirds, seeing the baby foxes. Flooding, of course, is always a possibility.  
Carol Crabill  
Casa Grande Rd.



## **LETTER 9: CAROL CRABILL**

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### **Response to Comment 9-1**

The comment does not specifically address the adequacy of the Draft EIR. Please see Master Response 1. Nevertheless, it is noted that the proposed project would meet the setback and height standards of the site's R4 zone, and thus, there is no requirement for a shadow analysis. The comment will be forwarded to the decision-makers for their consideration during the Site Plan and Architectural Review of the proposed project.

### **Response to Comment 9-2**

Please see Master Response 3.

### **Response to Comment 9-3**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 9-4**

Potential impacts to trees are evaluated under Impact 4.1-10 of the Draft EIR. As discussed therein, the proposed project would require permanent removal of an estimated 31 trees, including seven unprotected trees outside the riparian dripline and 24 protected trees within the riparian dripline. Because the seven trees outside of the riparian dripline are not protected, removal of such trees would not be considered a significant environmental impact under CEQA. In addition, the existing row of English oak trees on the adjacent senior housing property would not be removed during project construction. The project proposes a replanting plan to replace removal of protected trees in accordance with the City's Tree Preservation regulation by introducing 73 new trees onsite. Additionally, tree protection and replacement are imposed through Mitigation Measure 4.1-10.

### **Response to Comment 9-5**

Please see Master Response 4.



**Letter 10**

**From:** [Carol Crabill](#)  
**To:** -- City Clerk; [Kevin McDonnell](#); [Karen Nau](#); [Mike Healy](#); [Barnacle, Brian](#); [Dennis Pocekay](#); [John Shribbs](#); [Janice Cader-Thompson](#)  
**Subject:** EIR Creekwood  
**Date:** Tuesday, September 10, 2024 1:01:00 PM

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

Dear City Councilmembers,

- |             |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>10-1</b> | If you haven't walked the neighborhood, I wonder if you can understand why the Creekwood Housing Development as currently designed should be rethought.                                                                                                                                                                                                                                                                          |
| <b>10-2</b> | If you haven't 1) witnessed the chaotic traffic on Casa Grande Road during the morning drop off and afternoon pick up of Casa Grande High School students, or 2) visualized what the new U-shaped street will add to traffic woes or                                                                                                                                                                                             |
| <b>10-3</b> | 3) strolled through the senior apartments at 400 Casa Grande Road to imagine how three-story condominiums will block the winter sun, how can you vote responsibly?                                                                                                                                                                                                                                                               |
| <b>10-4</b> | The developers at their June "neighborhood meeting" could not give us even a rough estimate of what buyers of Creekwood homes will pay to live there. Who will afford to live there? Those who work here and commute long distances to work here? Or people who work elsewhere but want to live in Petaluma and will commute elsewhere to work?                                                                                  |
| <b>10-5</b> | There are already significant traffic issues on Casa Grande Road, especially related to when school is in session. But try to imagine students and neighborhood residents exiting during an emergency, such as a wildfire or an earthquake, and the possible injury or loss of life due to residential overcrowding across the street from a high school that has a student body 1.5 times that of Petaluma High.                |
| <b>10-6</b> | The aforementioned three-story condominiums will shade seniors' vegetable gardens and wall off the energy- and cost-saving sun to some apartments in winter. Please consider restricting the condominiums to two stories, which will lessen the negative effect on the residents of this PEP Housing complex.                                                                                                                    |
| <b>10-7</b> | As you consider how you will vote on this EIR, please consider that, currently, there is no representative from District 4 on the Petaluma City Council. Despite the belief that some of you have that you represent all Petalumans, you only have the constituents from your own districts who, through their votes, hold you accountable. Those of us who live in District 4 do not have a representative to hold accountable. |

Carol Crabill



## **LETTER 10: CAROL CRABILL**

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### **Response to Comment 10-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 10-2**

Please see Master Response 3.

### **Response to Comment 10-3**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1 and Response to Comment 9-1.

### **Response to Comment 10-4**

Financial concerns are not considered a physical environmental impact under CEQA. Please see Master Response 1.

### **Response to Comment 10-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 3. In addition, “residential overcrowding” would not result from the proposed project, as the project is consistent with the City’s General Plan land use designation for the site. As such, the street system has been designed to handle the volume of traffic associated with existing and planned uses in the vicinity. Furthermore, school personnel and/or local police could be employed to implement traffic control in the event of an emergency.

### **Response to Comment 10-6**

Please see Response to Comment 4-4 with respect to building heights.

### **Response to Comment 10-7**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.





**Letter 11**

**From:** Sara Young Golightly <[REDACTED]>  
**Sent:** Monday, September 9, 2024 4:45 PM  
**To:** Orozco, Uriel <[uorozco@cityofpetaluma.org](mailto:uorozco@cityofpetaluma.org)>  
**Subject:** Public Comment - Sept 10, 2024

You don't often get email from [REDACTED]. [Learn why this is important](#)  
---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---  
Dear Planning Commission,

I am writing in regards to the Creekwood Housing Development proposal you will be reviewing during your meeting on September 10, 2024.

11-1 I am a homeowner in the Del Oro neighborhood and my property is directly impacted by the Makenna (formerly Casa Grande) housing development and will be closely affected by Creekwood. While my husband and I are supportive of increasing the amount of available housing in Petaluma, we have some concerns about the uptick in traffic on Casa Grande and surrounding roads, particularly in the morning during school drop-off at Casa Grande High School and nearby elementary schools. Our children attend one of those nearby elementary schools and we haven't been able to allow them to walk or ride bikes in the morning due to the already chaotic traffic, excessive speed, unsafe U-turns, and distracted driving that happens on a regular basis. It's daunting to imagine what the influx of traffic from constructing 59 new homes will have on an already congested situation.

11-2 Another concern for the new development is the seemingly insufficient amount of parking that will be available to the new residents. Living in SE Petaluma, our neighbors consist of families and people with employment that requires further commutes and sometimes extra work vehicles. There are also several homes that are supporting multi-generational living due to the high cost of living in our area. I can respect the City encouraging people to choose public transportation and pedestrian/bicycle options, but I have yet to see any impactful improvements to connect this part of town in a way that will make residents comfortable giving up their vehicle or moving to a one car household. The Makenna housing has already impacted my neighborhood with additional cars overflowing onto our street, I am worried the proposed pathways will only increase that issue with people parking on Del Oro and walking over to Creekwood. I also can see the irony in advocating for more parking after expressing concern about traffic, but that is because I believe 59 units is far too many for this particular street and area of town.

11-3 I am also curious as to the necessity of the bridge connecting the paths over Adobe Creek and what entity will be in charge of the maintenance of the bridge. Will the City ensure it is kept clean and safe for families and wildlife?

11-4 Additionally, there is concern over the environmental impact the construction of the bridge will have on the wildlife that live in the creek area and use it as a natural corridor. I know there are various reptile and amphibian species, not to mention gray fox and deer that frequent that portion of the creek.

11-5 As someone that has lived in this neighborhood for over 14 years, I can think of very few instances where I wished there was a connection to the creek pathway there and I think it would have more of a negative impact on the neighborhood than a positive one. Have you bothered to ask the neighbors if they even want it?

11-6 Thank you for taking the time to read this and consider my comments. My hope is that you will consider reducing the number of units being built on this site and eliminate the 3-story option entirely, as well as cancel plans for the bridge over the creek.

Sara Golightly





## **LETTER 11: SARA GOLIGHTLY**

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### **Response to Comment 11-1**

Please see Master Response 3.

### **Response to Comment 11-2**

Please see Master Response 5.

### **Response to Comment 11-3**

Please see Master Response 2.

### **Response to Comment 11-4**

Please see Master Response 4.

### **Response to Comment 11-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1 with respect to general comments and Master Response 2 with respect to the multi-use bridge. As discussed on page 1-3 of the Draft EIR, a Notice of Preparation and a detailed IS were prepared for the proposed project and circulated from October 21, 2022, to November 21, 2022. A public scoping meeting was held on November 14, 2022, for the purpose of informing the public and receiving comments on the scope of the environmental analysis to be prepared for the proposed project.

### **Response to Comment 11-6**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.



**Letter 12**

**From:** Jean Hazelton <[REDACTED]>  
**Sent:** Tuesday, September 10, 2024 4:01 PM  
**To:** Orozco, Uriel <[uorozco@cityofpetaluma.org](mailto:uorozco@cityofpetaluma.org)>  
**Subject:** Fwd: EIR Creekwood

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**12-1**

>  
> I am in total agreement with this email that Carol Crabill sent to you today. Count me  
in as one totally opposed to the current design of the Creekwood Development  
>  
> Jean Hazelton  
> [REDACTED]  
> Petaluma  
>  
>>  
>>  
>>  
>>> On Sep 10, 2024, at 1:00 PM, Carol Crabill <[REDACTED]> wrote:  
>>>  
>>>

**12-2**

>>> Dear City Councilmembers,  
>>>  
>>> If you haven't walked the neighborhood, I wonder if you can understand why the  
Creekwood Housing Development as currently designed should be rethought.  
>>>  
>>> If you haven't 1) witnessed the chaotic traffic on Casa Grande Road during the  
morning drop off and afternoon pick up of Casa Grande High School students, or 2)  
visualized what the new U-shaped street will add to traffic woes or 3) strolled through  
the senior apartments at 400 Casa Grande Road to imagine how three-story  
condominiums will block the winter sun, how can you vote responsibly?  
>>>  
>>> The developers at their June "neighborhood meeting" could not give us even a  
rough estimate of what buyers of Creekwood homes will pay to live there. Who will  
afford to live there? Those who work here and commute long distances to work here?  
Or people who work elsewhere but want to live in Petaluma and will commute  
elsewhere to work?  
>>>  
>>> There are already significant traffic issues on Casa Grande Road, especially  
related to when school is in session. But try to imagine students and neighborhood  
residents exiting during an emergency, such as a wildfire or an earthquake, and the  
possible injury or loss of life due to residential overcrowding across the street from a



**Letter 12 Cont.**

**12-2  
Cont.**

high school that has a student body 1.5 times that of Petaluma High.

>>>

>>> The aforementioned three-story condominiums will shade seniors' vegetable gardens and wall off the energy- and cost-saving sun to some apartments in winter. Please consider restricting the condominiums to two stories, which will lessen the negative effect on the residents of this PEP Housing complex.

>>>

>>> As you consider how you will vote on this EIR, please consider that, currently, there is no representative from District 4 on the Petaluma City Council. Despite the belief that some of you have that you represent all Petalumans, you only have the constituents from your own districts who, through their votes, hold you accountable. Those of us who live in District 4 do not have a representative to hold accountable.

>>>

>>> Carol Crabill

>>>

>>>

>>>

>>>

>>>



## **LETTER 12: JEAN HAZELTON**

---

### **Response to Comment 12-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 12-2**

Please see Responses to Comments 10-1 through 10-7.



**Letter 13**

**From:** [ahillstead](#) [REDACTED]  
**To:** -- City Clerk  
**Cc:** [Barnacle, Brian](#); [Janice Cader-Thompson](#); [Dennis Pocekay](#); [Karen Nau](#); [Mike Healy](#); [John Shribbs](#); [Kevin McDonnell](#)  
**Subject:** Comments for Creekwood Development Housing Project  
**Date:** Friday, September 13, 2024 12:33:59 PM

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13-1

My name is Amy Hillstead and I am a resident of the new Makenna community directly adjacent to the proposed Creekwood development. Prior to moving into Makenna, I lived in an affordable HLT home in the Southgate community for 10 years. That community is just one mile South from the proposed project, so I am very familiar with this area, as well as the need for higher density projects.

13-2

**With that said, in an effort for the proposed Creekwood project to be a “good” neighbor, I am asking for the city to modify the proposed plan in these ways so the development can sufficiently meet the parking needs and lifestyles of its residents by:**

- (1) eliminating the 3-story triplexes that are not in harmony with any other building or housing development in this area, and replace with 2-story townhomes and duets,**
- (2) installing wider, side-by-side, cement driveways that can comfortably accommodate two larger vehicles, and/or**
- (3) requiring all units to have 2-car garages,**
- (4) adding more street and guest parking throughout the development ,**
- (5) discontinuing plans for the bridge and the connecting pathways to the Makenna and Spyglass neighborhoods.**

13-3

Regarding,

- (1) eliminating the 3-story triplexes that are not in harmony with any other building or housing development in this area, and replace with 2-story townhomes and duets.**

A significant concern with this proposed project is that its three-story triplex design is not in harmony with the single and two-story design of its surrounding southeast Petaluma neighborhoods, and is blatantly inconsiderate to its adjacent two-story existing neighbors. This is NOT a fast-paced, downtown location. This is a quiet, suburban area on the edge of town that lacks a robust and reliable public transportation infrastructure and is located on a road known to city officials as being **unequipped** to safely handle even the traffic it serves now, let alone another 59-units and their guests. Three-story triplexes are completely inappropriate for this location.

But more importantly, on paper it's says 3-story triplexes, but in reality, they will actually appear more like 4-story buildings due to this proposed development's location in the 100 year flood plain as designated by FEMA. This important FEMA fact is important because it means that the development will be built up an additional 5-6 feet to address the flood concerns and to encourage a map-rezoning by FEMA to no longer classify it as being in a flood plain that requires flood insurance for its homeowners. This exact situation occurred in the recently





**Letter 13 Cont.**

**13-3  
Cont.**

completed Makenna neighborhood.

The deception by the developer in presenting the Makenna homes as just 2-story homes, instead of the lived reality of nearly 3-story residences caused immense anger by the adjacent Del Oro neighborhood that still is felt today by many within that Del Oro community. I encourage you to drive to Del Rancho Way at Del Oro Circle to see what an “elevated” 2-story residence feels like in reality to its existing neighbor, so you will better understand what a yes vote to an “elevated” 3-story building might look and feel like (4-story buildings) to their 2-story neighbors, before voting.

*(Also on another related side note, to give you a different perspective, when I was an affordable HLT homeowner, I just wanted to be able to blend into the community without everyone knowing that I was part of the affordable housing community. It's hard to blend into a community and feel like you belong when you live in the only 3-4 story building in all of southeast Petaluma. The city can still achieve a significant number of higher density, lower incomes residences—albeit maybe not 59-units worth—using townhomes and duets that better fit the aesthetics of the surrounding community and allows these families to feel as though they not only belong but hopefully, we create a more welcoming environment for them with the nearby existing neighborhoods.)*

I understand the need for more affordable and higher density housing but feel this should be done in a responsible and mindful approach that considers the adjacent neighbors, the safety of the road infrastructure that serves the project, and the aesthetic of the community with which it is being built, even it means that the overall unit capacity is reduced in order to maintain happy and harmonious communities as encouraged in the city's blue zone initiative.

Regarding,

- (2) installing wider, side-by-side, cement driveways that can comfortably accommodate two larger vehicles, and/or
- (3) requiring all units to have 2-car garages,
- (4) Adding more street and guest parking throughout the development,

**13-4**

One of my concerns for the proposed development is that because of unrealistic metrics for car usage and car ownership, this project lacks sufficient parking to be a self-contained, self-reliant neighborhood. As such, the domino parking effect caused by potential Creekwood neighbors moving into other neighborhoods to meet their parking needs, will have a direct and negative impact on nearby communities.

Examples of this can be found in both the nearby Makenna/Del Oro neighborhoods (which I will address shortly) and the Grove Apartments/Southgate neighborhoods. Both of which, have had residents seeking parking outside of their neighborhood due to insufficient housing in their own neighborhood, despite having to traverse a sizable distance to do so.

In the Southgate neighborhood, residents of the Grove apartments walk across the busy Frates Road into the Southgate neighborhood to find parking. As a result, some Southgate neighbors have started using orange cones to block Grove residents from parking in front of their homes, and neighbors have even looked into converting Southgate into a permit-only neighborhood.





**Letter 13 Cont.**

**13-4  
Cont.**

As mentioned previously, the recently completed Makenna neighborhood is another example of a development that was designed with an insufficient amount of parking that ended up having negative consequences and creating tension and strife between it and the adjacent Del Oro neighborhood. This tension has led to multiple complaints being submitted to the city regarding parking violations on both sides. This is not a problem that is going away. In fact, it will only get worse once the proposed Creekwood development is complete, since this proposed project has even less parking spaces per capita than the Makenna neighborhood. It's not a matter of if there will be parking issues stemming from the proposed Creekwood project, it's a matter of when will it begin and how far-reaching will it extend?

In the Makenna neighborhood, insufficient street parking was created by (1) limited street parking due to multiple red zones along Del Rancho Way, (2) narrow side-by-side driveways that are not big enough to handle two of today's commonly, oversized vehicles, and (3) 19% of Makenna's 36-units were required by the city to be single-car, single-driveway residences. I hope the city recognizes the problematic similarities between the proposed Creekwood and Makenna communities and make changes, in kind.

Please also realize that providing insufficient parking does not motivate people to eliminate cars or change their lifestyle, it just makes people find other areas to park their cars, which will always impact other neighborhoods.

Regarding,  
(5) discontinuing plans for the bridge and the connecting pathways to the Makenna and Spyglass neighborhoods.

**13-5**

As a natural effect of the insufficient amount of parking found in Creekwood and the proposed installation of a bridge and connected pathways to nearby neighborhoods, Creekwood residents would most surely use these quiet and easy routes to find the available parking they so desperately need.

As a result, neighborhoods will not only experience a daily influx of vehicles and pedestrians entering their streets to find parking, leading to more neighbor to neighbor animosity and strife, but they will also experience increased levels of unsupervised minors from the high school roaming their neighborhoods.

**13-6**

This age demographic, when unsupervised, brings unique concerns into neighborhoods associated with safety, crime, littering, property damage, and just general disrespect and disregard for neighbors and young children, in part due to the poor decisions made with their undeveloped, frontal cortexes. The high school's open-campus policy doesn't help the situation either. For these reasons, I do not support connecting the pathways between the neighborhoods or adding a bridge.

**13-7**

*On a related side note, the Makenna pathway was not designed for this type of increased and heavy pedestrian traffic; nor was it designed for bicyclists at all. The Makenna pathway lacks sufficient safety features like street lights, and environmentally-conscience features like trash receptacles to prevent trash from going into the creek and affecting protected fish and wildlife populations. The pathway is narrow and does not allow both pedestrian and bicycle traffic to safely pass each other. The 4-ft drop into the water retention basin is only separated by an easily damaged, split-rail fence that for whatever reason, teenagers like to try to balance on like a balance beam. The public entrance to the pathway is not easily visible and therefore,*



**Letter 13 Cont.**

**13-7  
Cont.**

*most individuals accessing the pathway, do so by jumping or climbing over the gate that was installed to deter individuals from even using the private driveway as an access point. Not too mention that the Makenna pathway was not designed for year-around, heavy traffic because it was made from decomposed granite—not cement. The lived reality of decomposed granite is that it becomes a soupy mess in the rainy season and not conducive to walking on without making a complete mess of your shoes. When individuals walk on the wet surface, it leaves behind ruts and foot holes from the bicycle tires and feet, and the damaged surface stays in that condition when it dries, leaving the pathway uneven and unsafe. Not too mention, the Makenna pathway is also maintained by private citizens through an HOA. So any damages, maintenance, or improvements that would need to be made to accommodate such a drastic change in its intended use would be substantial and at the expense of its private citizens.*

*In hindsight, I feel it is incredibly unfair and unjust of the City to have approved such a low quality and unsafe pathway in the Makenna neighborhood that private citizens are required to maintain, knowing all along that it wanted to eventually connect other pathways to it in the name of “connectivity” and also knowing that such a connected pathway with its close proximity to the high school would absolutely effect and change the intended use of it’s small walkway. The walkway was designed and built for 36 households, not for the hundreds, if not thousands, of potential units it will now be serving in the proposed Creekwood, Spyglass, Grove Apartments, and Southgate neighborhoods whose Ely/Casa Grande route is the primary route to access the high school and public transportation locations. I would imagine that if the city was tasked with maintaining the pathway, it would have used a safer design with more durable materials.*

*Unfortunately, it appears that the real losers in this whole situation is now the Makenna neighbors, who will have increased traffic from both unsupervised high school minors and adult neighbors using their community either as a parking lot or a pass through, who have to pay for all the damages and maintenance that will be incurred because of it, all while fielding parking violations submitted by Del Oro neighbors.*

Overall, building a community infrastructure that cannot support itself AND that puts the responsibility of supporting and absorbing the parking needs on nearby streets and communities, AND that does so under the guise of “connectivity” AND then requests private citizens to pay for the lived reality of its choices, shows lack of understanding, awareness, and care for it’s citizens and is just irresponsible, unprofessional, inconsiderate and infuriating.

**13-8**

**I do hope that you will be mindful of the other nearby community members when approving this project. I am not asking for the project to stop, I’m asking for the city to compromise and request modifications to its design and capacity to have the least, minimal impact to all the nearby neighborhoods by:**

- (1) eliminating the 3-story triplexes that are not in harmony with any other building or housing development in this area, and replace with 2-story townhomes and duets.**
- (2) installing wider, side-by side, cement driveways that can comfortably accommodate two larger vehicles, and/or**
- (3) requiring all units to have 2-car garages,**
- (4) Adding more street and guest parking throughout the development ,**
- (5) discontinuing plans for the bridge and the connecting pathways to the Makenna and Spyglass neighborhoods.**



**Letter 13 Cont.**

Thank you for your time and consideration.

Amy Hillstead  
[REDACTED] 4



## **LETTER 13: AMY HILLSTEAD**

---

### **Response to Comment 13-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 13-2**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1 with respect to general comments pertaining to environmental concerns. Each of the concerns listed in the comment are expanded upon in following comments; as such, further responses are provided below.

### **Response to Comment 13-3**

Please see Response to Comment 4-4 with respect to building height. In addition, Master Response 3 addresses safety concerns on Casa Grande Road.

Potential impacts related to altering the existing drainage pattern in a manner which would substantially increase the rate or amount of surface runoff and result in flooding on- or off-site was addressed in Chapter 4.3, Hydrology and Water Quality, of the Draft EIR. As discussed under Impact 4.3-3, the proposed project would include new fill to elevate the building pads upon which the new residences would be constructed. However, the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) 06097C1001G identifies the portions of the project site that would be developed with the proposed residences and internal roadway as being within Zone X and outside of a Special Flood Hazard Area (SFHA). Therefore, the 100-year floodplain would not encroach upon the habitable areas of the project site.

In addition, potential aesthetic impacts associated with the proposed project are addressed in Section I of the IS, which is on pages 27 through 29. As discussed under question I-c on page 28, the project site is within an urbanized area, and the relevant threshold is whether the proposed project would conflict with applicable zoning and other regulations governing scenic quality. The proposed project would be required to comply with all applicable regulations and standards set forth by the Petaluma IZO, as ensured by the City's Site Plan and Architectural Review process.

### **Response to Comment 13-4**

Please see Master Response 5.

### **Response to Comment 13-5**

Please see Master Responses 2 and 5.

### **Response to Comment 13-6**

Please see Master Response 1, which includes sections on comments related to the focus of CEQA review, as neighborhood character is not a physical environmental effect, as well as a section responding to concerns related to potential public pedestrian access through the off-site bridge connection.

### **Response to Comment 13-7**

The comment largely does not address the proposed project, but discusses separate development decisions made by the City. As such, the comment does not address the adequacy



of the Draft EIR. Please see Master Response 1. With respect to parking needs, please see Master Response 5.

**Response to Comment 13-8**

The comment summarizes earlier comments and does not address the adequacy of the Draft EIR.





**Letter 14**

**From:** [Brandon Hillstead](#)  
**To:** -- City Clerk  
**Cc:** [Barnacle, Brian](#); [Janice Cader-Thompson](#); [Dennis Pocekay](#); [Karen Nau](#); [Mike Healy](#); [John Shribbs](#); [Kevin McDonnell](#)  
**Subject:** Creekwood housing project comments  
**Date:** Monday, September 16, 2024 10:52:46 AM

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14-1

I am a resident of the Makenna community and will be directly affected by the post-build effects that this proposed Creekwood development (with its connected pathways) will have on the existing nearby neighborhoods and community. In regards to the proposed Creekwood development, please do not approve this development as is. To make this development more neighborly to the neighborhoods around it, I kindly request these changes:

14-2

1 Increase and improve parking spaces by eliminating all triplexes and replacing with more of the duet homes found elsewhere in the development. Also, please pave both 2-car driveway spaces in front of each duet, and widen driveways by 12-18" to better accommodate two modern-day sized SUV's/Van/Truck vehicles that are commonly found in our SE Petaluma communities. (In addition, to encourage residents to actually use their garage for parking, please consider not installing garage doors. This is a strategy that Rohnert Park has adopted in some developments to discourage residents from misusing their garages for storage or for additional living spaces instead of for parking). Additionally, the triplexes are completely out of place for this Southeast Petaluma location and is extremely inconsiderate all of the nearby 1- and 2-story communities that are adjacent to this proposed development. Please replace with the more appropriate duets or townhomes as mentioned previously.

14-3

2 Eliminate the bridge and the connected pathways to the Makenna and Spyglass neighborhoods. The bridge and pathway will single-handedly bring hundreds of additional vehicle and foot traffic each month to the Makenna and Spyglass neighborhoods (caused by Creekwood residents trying to find additional parking and unsupervised minors heading to or leaving the high school). The increased vehicle and foot traffic in these existing neighborhoods and common areas will decrease the safety found in these neighborhoods and increase the financial burden of private citizens to maintain these areas. (FYI. The Makenna pathway and area along the pathway is owned and maintained by private citizens of the Makenna Homeowners Association. Installing a bridge and connecting the proposed Creekwood pathway to the Makenna pathway will change the use of the Makenna common area from a quiet walking path that serves 36 residences to a public pass through that serves hundreds of people per day from 5-7 nearby large neighborhoods. This change will bring greater wear & tear and damages to the Makenna common area that its private citizens will have to pay for.) It's unfair and unethical to force a change on these neighborhoods and then expect them to pay to maintain that change.

14-4

3 Redesign Casa Grande Road and Ely Road to include street parking and address known safety issues around the peak drop off and pick up times for the high school. During these peak times, these roads become extremely dangerous. Building another community on or near these busy and dangerous roads without addressing the known safety issues prior is irresponsible and negligent.





**Letter 14 Cont.**

Thank you for the consideration.

Sincerely,  
Brandon Hillstead



## **LETTER 14: BRANDON HILLSTEAD**

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### **Response to Comment 14-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 14-2**

Please see Master Response 5.

### **Response to Comment 14-3**

Please see Master Responses 1 and 2.

### **Response to Comment 14-4**

Please see Master Response 3.



**Letter 15**

**From:** Elaine K <[REDACTED]>  
**Sent:** Tuesday, September 10, 2024 3:15 PM  
**To:** Orozco, Uriel <[uorozco@cityofpetaluma.org](mailto:uorozco@cityofpetaluma.org)>  
**Subject:** EIR Hearing 9/10/24

You don't often get email from [REDACTED]. [Learn why this is important](#)  
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OUTSIDE OUR EMAIL SYSTEM.---  
See two pages attached  
Please include in EIR discussion tonight



**Letter 15 Cont.**

Monday, September 9, 2024

**Draft EIR “Creekwood” 270 & 280 Casa Grande Rd  
Public Hearing Sept 10, 2024**

**Re: Planning Comm members duty of Due Diligence to assess the current conditions for pedestrian, cyclist, vehicle traffic in the Casa Grande Rd and ELY traffic circle area.**

**Will you each agree to be present during M-F “commute hours” (7:30 to 8:55 AM and 3:30 to 6:00 PM); and to also return during school pick-up & drop-off hours?**

**If YES, you’ll take your own measure of the current conditions for residents and HS students in the immediate area of the proposed Creekwood subdivision.**

15-1

**DRIVE.** (enter Casa Grande Rd from either So McDowell or from Lakeville), then drive NE over the Pedestrian crosswalk west of McKenna, past the entry exit driveway at McKenna, past the proposed Creekwood two entry exit driveways, take an immediate right turn to enter PEP Senior Housing parking lot to circle the parking lot and then re-enter CG Rd to continue NE to ELY traffic circle, (noting multiple “failure to yield/ failure to signal infractions”); then re-enter CG Rd to drive SW and find PARKING on CG Rd adjacent to two HighSchools.

**PEDESTRIAN**

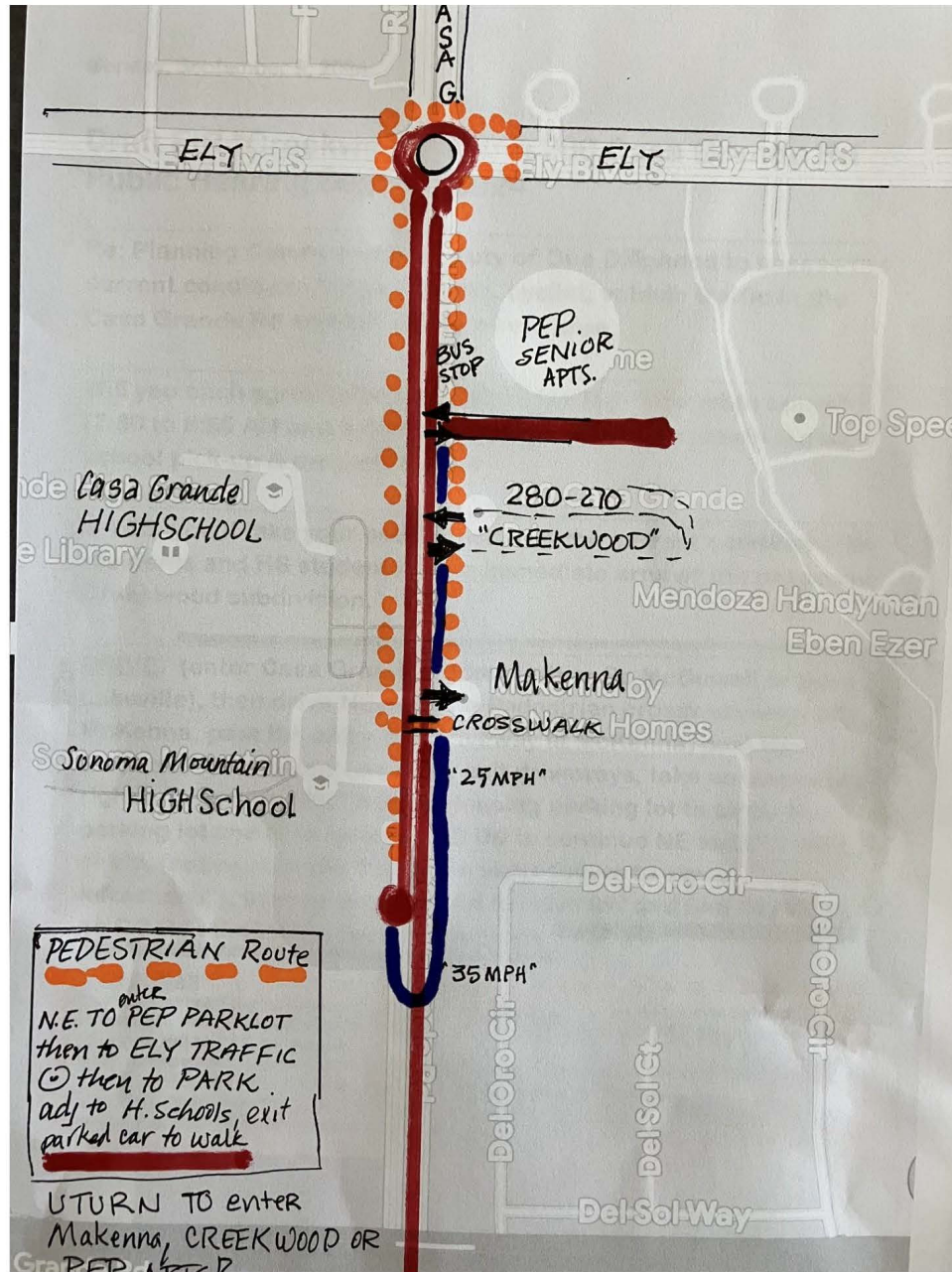
Exit your parked car to enjoy the pedestrian experience of crossing that lighted crosswalk, then walk NE past the McKenna and Creekwood and PEP driveway to the Bus stop adj to PEP parking lot

Note the speeding violations of commuting traffic entering ELY from CG Rd ... then walk from bus stop to the crosswalks at ELY to return to your parked car.

Upon return to your car, execute the required U turn to return NE on CG Rd.... Perhaps to enter proposed Creekwood or existing McKenna or PEP Housing.



Letter 15 Cont.



**LETTER 15: ELAINE K**

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**Response to Comment 15-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.





**Letter 16**

**12: draft EIR, Creekwood**

270-280 Casa Grande Rd

Public hearing 9/16/2

Pedestrian and vehicle safety issues

**16-1**

Casa Grande Rd, Ely traffic circle are inadequate roadways for the current M-F commuter and high school vehicle/ bicycle traffic. The Creekwood proposed addition of 59 households, with >100 cars, and pedestrians from those condos is a crisis for all current and future residents.

**16-2**

Does EIR include estimated increases in city funds to service Police and Fire emergency responses to increases in traffic collisions, speeding enforcement /other traffic violations?

**16-3**

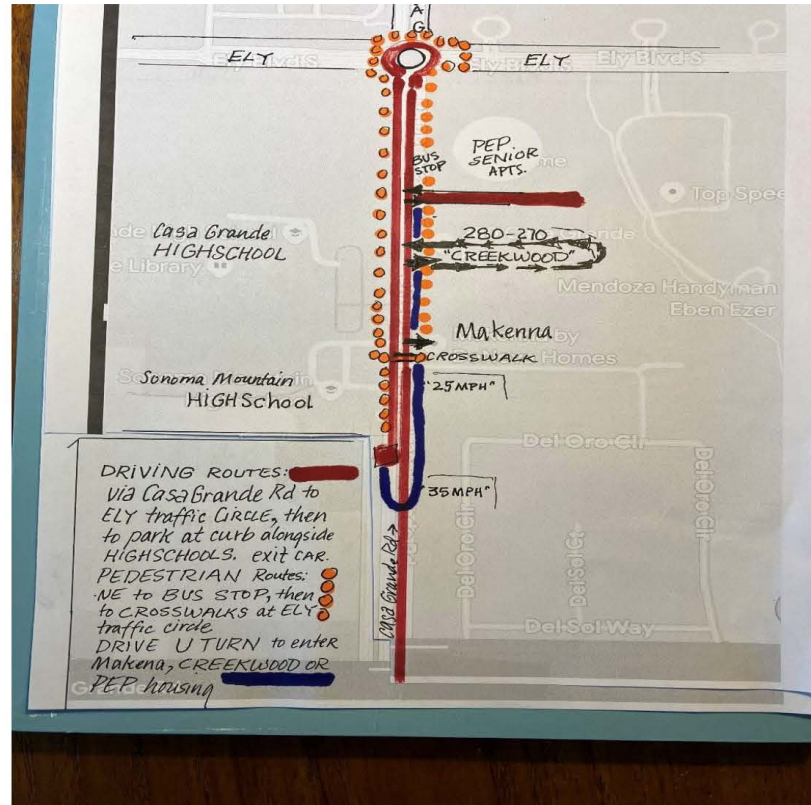
Please see enclosed map with suggested pedestrian and vehicle routes for you each to personally experience the existing environment prior to your OK of the Creekwood development and its proposed TWO Exit Entry driveways to 59 homes?



**Letter 16 Cont.**

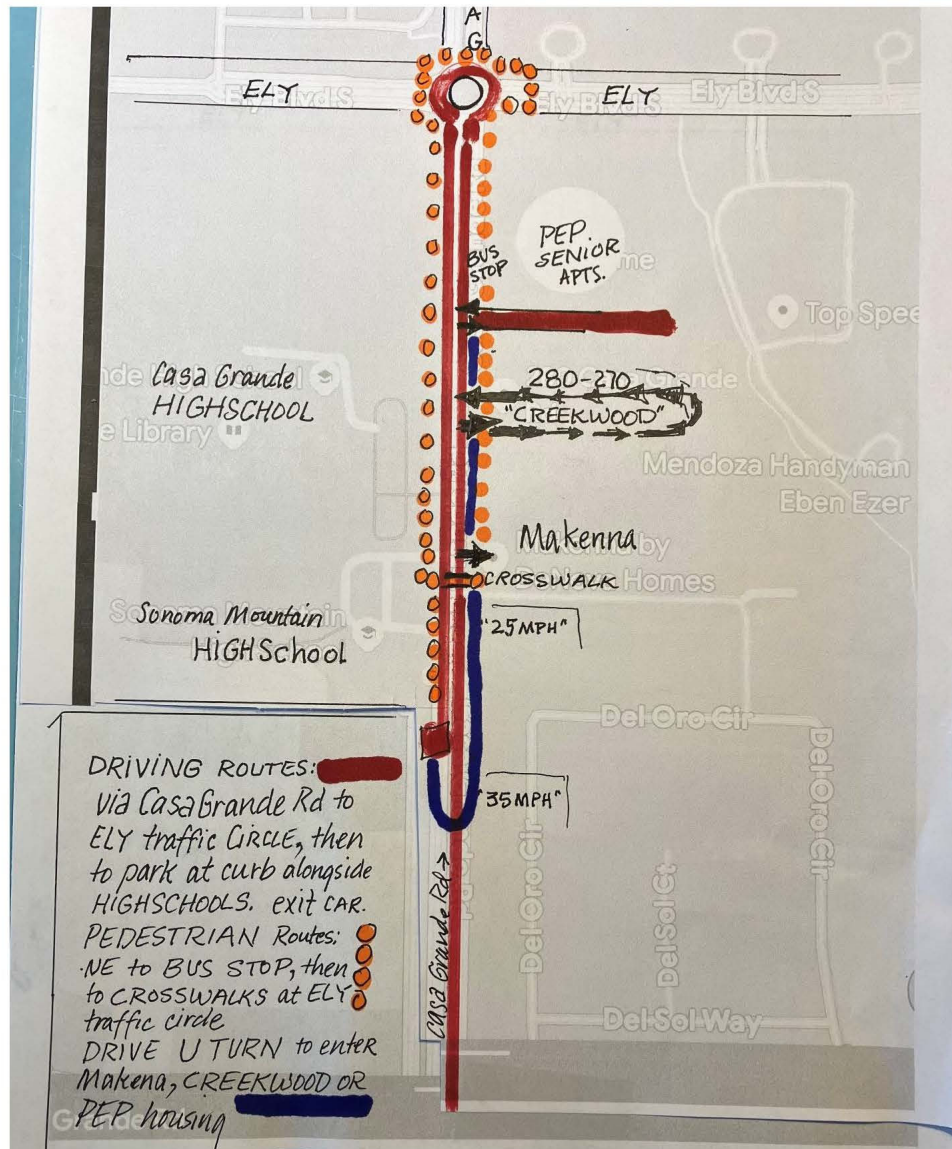
From: Elaine K <[REDACTED]>  
Sent: Monday, September 16, 2024 12:28 PM  
To: Orozco, Uriel <[uorozco@cityofpetaluma.org](mailto:uorozco@cityofpetaluma.org)>  
Subject: item.12 EIR Creekwood 9/16/24 public hearing

16-3  
Cont.



Letter 16 Cont.

16-3  
Cont.



## **LETTER 16: ELAINE K**

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### **Response to Comment 16-1**

Please see Master Response 3.

### **Response to Comment 16-2**

Please see Master Response 3. In addition, the proposed project's potential to impact local fire and police protection services related to emergency response times is discussed under questions XV-a and XV-b on pages 88 and 89 in the IS prepared for the proposed project. As discussed therein, new development within the City is subject to the City's Facilities Development Impact Fee, payment of which ensures that projects contribute a fair share of the construction and acquisition costs associated with new or expanded public facilities. As such, revenues generated through the project's payment of the City Facilities Development Impact Fee would pay the project's fair share toward any new fire or police facilities deemed necessary by the City. Any estimations of future City funding allocations would be speculative and is not required under CEQA.

### **Response to Comment 16-3**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.





**Letter 17**

**From:** Joe Lampe <[REDACTED]>  
**Sent:** Sunday, September 8, 2024 7:30 PM  
**To:** Greg Powell <gpowell@cityofpetaluma.org>; Petaluma Planning <petalumapanning@cityofpetaluma.org>  
**Subject:** Proposed Creekwood Housing Development "DEIR"  
**Importance:** High

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---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

Dear Mr. Powell and City Planning Commission,

17-1

I received the Notice of Public Hearing for the proposed Creekwood Housing Development project. Thank you for the opportunity to comment. I have serious concerns about this proposed project as it relates to traffic, parking, noise pollution and simple development maintenance and economics.

17-2

I see that the city of Petaluma has prepared this DRAFT EIR report. I assume if the individuals who put the EIR report together actually live on the East side near this development, then project would not even have got this far in the process. If anyone who lives on the west side of Petaluma had anything to do in preparing this EIR report, the report should then be void. For the record, I am not an anti growth person. However, growth needs to be done responsibly and with future sustainability. All these reports and studies are all smoke and mirrors to appease legal requirements. All one has to do is come spend a few days on the east side near this proposed development and witness the existing traffic issues, parking issues, and noise pollution that currently exist in this area. (All, a result of these pocket developments that the city has approved over the years) I would like to say enough is enough, but not sure our voices even matter these days as it all comes down money. However, I am trying to be hopeful that my concerns, my neighbors, and others in the surrounding area concerns, are actually taken into consideration with proactive results rather than only verbal acknowledgement.

17-3

I purchased my house on Spyglass Road in 1992. The name of the development is Fairway Meadows. The house backs up to ELY Blvd. Since 1992, Ely has basically become like a highway. From about 4 am on, the traffic starts. Trucks roll through and they sound like they are going through the living room of the house. One of the big issues is Ely road has never been paved from the roundabout to Frates road. There has been water pipeline project where the road was dug up and never properly fixed. Strangely enough, Ely was paved from the round about north but for some reason the city did not pave from the roundabout south to Frates which is a very small stretch. Ironically, I see Garfield road got completely redone. This road is traveled a 1/16 of what Ely is, yet all this money went to completely repaving Garfield. Tearing up perfectly sound corners and putting in yellow dots makes no sense especially when the cost is approx. \$40k a corner. It also makes no sense when tree's that have uprooted sidewalks, don't get fixed before these corners. (which are perfectly safe). Then just last week, the city relined Ely road between the roundabout to Frates road, and they did this on a road that needs fixing not lining. It is like putting lipstick on a pig. Makes NO sense. In addition, this development is near the high school and

17-4



**Letter 17 Cont.**

<b>17-4 Cont.</b>	police presence is minimal, which is evident by the amount of people who treat Ely like the Indy 500 raceway. The amount of traffic and speeding and loud cars is very unsafe especially since it is right by the high school. NO development should be approved until the city can deal current existing issues.
<b>17-5</b>	This new development is right across the creek from Fairway Meadows. What I can say in living here since 1992, is that the maintenance on the development common areas was good approximately in the first 10 years. The last 22 years has been extremely poor. The water in common areas has NOT been turned on at ALL for several years. So the landscaping starves with everything dying and trees shedding leaf's through the entire summer. The maintenance crew supposedly comes once a month and does the absolute bare minimum and takes zero pride in their work which then becomes a reflection of our development . The trees that were approved for the development during the development stages are not the right trees rather the cheapest trees. If it was not for the home owners, the bridge and walls along ELY would be full of graffiti, and entry and development would look even worse than it currently does.
<b>17-6</b>	Oh and by the way, the little Fairway Meadows small development has never been slurry sealed or paved at all since it was development in 1992. Have you seen the road? You almost break your ankle walking on it.
<b>17-7</b>	Next you have the parking issues. People from the apartments already park in our development, and as you can see, all down Ely road. So if the EIR reports says parking is not an issue, again the people preparing the report don't live on the east side. Parking is a problem. I don't think you would like people driving into your court on the west side and parking in front of your house. I assume you would not think that is ok especially if the cars are there for days and when it garbage day, you have no where to put your cans except in the middle of the street.
<b>17-8</b>	Next you have the creek. You have homeless people that go up and down the creek and will sleep under the bridge. You have the high school pot smokers or drug dealings that go on in the creek. You have zero maintenance of the creek. The growth is out of control, and if it was not for winter washing the debri in the creek down stream, that would be another issue.
<b>17-9</b>	One would think that with the past new developments like Cross Creek and Stonegate, that you would see improvements in the area as a result of all the new tax revenue being generated, especially since no money has gone into the infrastructure. In fact, it has only declined.
<b>17-10</b>	In addition, the proposed footbridge over Adobe creek is a very bad idea that would create a direct path for Casa Grande students to attempt to enter the back end of the Grove apartments over a metal fence. Creating a safety issue along with trash and degradation of the Adobe Creek habitat. This already happens on a smaller scale. And granting access by building a footbridge will create serious problems and safety issues. Rather than build a bridge that will create more issues put the money toward fixing the roads. Smart decisions make a better future.
<b>17-11</b>	Therefore, as a result of the above, myself and my neighbors have serious concerns. Besides putting more money in the city treasury, how will this development





**Letter 17 Cont.**

**17-11  
Cont.**

be different then what we have experienced in Fairway Meadows and how will it benefit the area besides creating a massive amount more of traffic, noise pollution and parking issues? There is no way the EIR if done by people who live in the area, could or would support this new project. Who is to say this new development will not end up like Fairway Meadows? What will the city do with the additional tax revenue? Will it pave the rest of Ely and Fairway Meadows? Will there be more police presence in the area? Will the city put signs up that allow for parking in Fairway meadows for only residents and all other cars towed? I think we all know the answer to this.

**17-12**

This development and all city action impacts our lives here on the East side. I am sure this project will move forward regardless, as they always seem to no matter what facts are brought to the table. I would like to see what action the city will take to mitigate the issues noted above that already exist that have not been addressed? I assume they will approve this new development and nothing will be done. That would be a very sad outcome.

Thank you for your time and consideration.

Joe and Teresa Lampe  
[REDACTED]

 **JOE LAMPE**  
Sr. VP, Business Development  
Business Finance Capital

Direct: [REDACTED]  
Email: [REDACTED]

[www.bfcfunding.com](http://www.bfcfunding.com)  
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## **LETTER 17: JOE AND TERESA LAMPE**

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### **Response to Comment 17-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 17-2**

As discussed on page 4.4-7 of the Draft EIR and pursuant to CEQA Guidelines Section 15064.3, VMT is the primary metric used to identify transportation impacts. VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. VMT does not directly measure traffic operations, including congestion and roadway condition. In addition, Master Response 5 addresses parking concerns.

See Response to Comment 4-2 with respect to potential impacts related to permanent increases in noise.

### **Response to Comment 17-3**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 17-4**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1. In addition, please see Master Response 3.

### **Response to Comment 17-5**

As discussed on page 3-13 of the Draft EIR, newly planted trees adjacent to Adobe Creek would consist of native 24-inch box trees such as coast live oak, valley oak, and California Buckeye. In addition, new trees adjacent to the proposed structures would include 24-inch box trees such as marina arbutus and Chinese pistache, as well as 15-gallon trees such as pink dawn chiltalpa and swan hill fruitless olive. The final selection of which plant species would be used in project landscaping would comply with Petaluma IZO Section 14.010 and be selected from species and varieties known to thrive in the Petaluma climate.

### **Response to Comment 17-6**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 17-7**

Please see Master Response 5.

### **Response to Comment 17-8**

Please see Master Responses 1 and 4.

### **Response to Comment 17-9**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1 and note that revenues generated through the project's payment of the City Facilities Development Impact Fee would pay the project's fair share toward any new fire and police facilities deemed necessary by the City.



**Response to Comment 17-10**

Please see Master Response 1, which includes sections responding to comments related to the merits of the project, as well as comments on potential trespassing and public pedestrian access.

**Response to Comment 17-11**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

**Response to Comment 17-12**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.



**Letter 18**

**From:** [Bruce Mallon](#)  
**To:** -- City Clerk  
**Subject:** Re: Item number 12, Creekwood development  
**Date:** Monday, September 16, 2024 2:25:51 PM

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**18-1**

The Creekwood development could have as many as 150 automobiles parked inside. Traffic will be an extreme problem before before and after work. School across the street will be beginning in the morning when this rush-hour traffic is begins.

**18-2**

Seven of these dwellings will be called low cost. Where are the new owners of these other dwellings coming from? Local Petalumens cannot afford what is going in there.

**18-3**

Apartments adjacent to Pep Housing will be on our borderline. This will restrict the western sunset from shining on our gardens and apartments.

**18-4**

These problems are a potential mental health issue for many of the people who live here.

**18-5**

This is a very bad idea, and a bad plan. This should be reconsidered and shrunk down to a reasonable number and relocate the apartment buildings away from the eastern edge.

There are over 100 voters living inside of the Pep Housing.

Sincerely, Bruce Mallon  
resident for five years  
in Pep Housing.

Always B nice



## **LETTER 18: BRUCE MALLON**

---

### **Response to Comment 18-1**

Please see Master Responses 3 and 5.

### **Response to Comment 18-2**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 18-3**

Please see Response to Comment 4-4.

### **Response to Comment 18-4**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1 and Response to Comment 9-1.

### **Response to Comment 18-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.



**Letter 19**

**From:** Michael McBride <[REDACTED]>  
**Sent:** Monday, September 9, 2024 3:43 PM  
**To:** -- City Clerk <cityclerk@cityofpetaluma.org>; Greg Powell  
<gpowell@cityofpetaluma.org>; Petaluma Planning  
<petalumaplanning@cityofpetaluma.org>  
**Subject:** Draft EIR Report 270 and 280 Casa Grande Road

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OUTSIDE OUR EMAIL SYSTEM.---

Good Afternoon,

Please see attached letter concerning the proposed development at 270 and 280 Casa Grande Road.

Thank You

Michael P. McBride





**Letter 19**

September 9, 2024

Petaluma City Council  
111 English St.  
Petaluma, Ca94952

Dear City Council Members,

- |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>19-1</b> | <p>A few days ago, I received a notice of a public hearing concerning the draft EIR report dealing with the Creekwood Housing Development at 270 and 280 Casa Grande Road.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>19-2</b> | <p>I have lived at 1770 Silverado Circle for the past 25 years. My home is on the corner of Silverado Circle and Spyglass. My backyard backs onto Ely Blvd South. Across the street is Adobe Creek. There are four additional homes on Silverado Circle that back Ely Blvd South. I have many concerns in reviewing the notice I received.</p>                                                                                                                                                                                                                                                                                                                                                             |
| <b>19-3</b> | <p>I have seen a remarkable increase in the traffic flow on Ely Blvd South. One factor to this increase was the development of the Southgate neighborhood. It is also is a truck route and large trucks pass by my backyard at all hours of the day. My bedroom looks onto Ely Blvd South and at times my windows rattle from the speed and amount of traffic passing by. The road is in poor condition and I haven't heard of any of the new tax money being used to repair the road which will continue to deteriorate with the passing of time and increase of traffic. This new development will increase the amount of traffic and noise not to mention the increase in Greenhouse Gas Emissions.</p> |
| <b>19-4</b> | <p>Another concern is parking in the neighborhood. The proposed footbridge will allow individuals to park in our neighborhood and walk over the bridge to their new homes. Individuals across the street in the Adobe Creek golf course neighborhood use our streets as their overflow parking and adding this footbridge will take up additional parking spaces. The footbridge will also attract homeless and high school student to come into our neighborhood and leave their trash in the creek as well on our street.</p>                                                                                                                                                                            |
| <b>19-5</b> | <p>This footpath does not benefit those of us who live in our neighborhood. The city only comes by once a week with the street sweeper and the city contract with the gardening service only allows them to come into the neighborhood once a month.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>19-6</b> | <p>The city is getting ripped off by this contract as the company does a poor job of maintenance. Also, the water has been turned off for years due to the bad decision by the city of selecting trees for the neighborhood which have ruptured the water lines as well as the sidewalks. These trees have not been trimmed in years and the leaves from the trees on Ely Blvd South fall into my backyard from August to December.</p>                                                                                                                                                                                                                                                                    |
| <b>19-7</b> | <p>This new development does not benefit my neighborhood and only adds to the noise and congestion we are already living with. The quality of life the city prides itself on fails those who already live, work, and play here.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |



**Letter 19**

**19-8**

The problem with an outside company conducting an EIR report is the fact that it is a sterile report. It does not take into account those who live in the area. If they lived in the neighborhoods surrounding the proposed development, they would see our actual concerns.

Those who are conducting the EIR should come into our neighborhood at different times of the day. A traffic study should be conducted to see the number of cars and big trucks that rumble through Ely Blvd South and the decibel readings they generate.

Those who are conducting the EIR report along with the planning department should come out and actually see the area in question including the amount of students who walk and drive to and from school. This development does not benefit them, only creates potential problems such as increase in auto and pedestrian accidents.

I invite the council and especially our District Four representative to walk the neighborhoods surrounding this proposed development to see the impact it will have on our community.

Thank you for your time and consideration.

Michael P. McBride

[REDACTED]  
[REDACTED]



## **LETTER 19: MICHEAL MCBRIDE**

---

### **Response to Comment 19-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 19-2**

Please see Response to Comment 17-3.

### **Response to Comment 19-3**

The comment does not specifically address the adequacy of the Draft EIR. Please see Master Response 1. Potential impacts related to transportation are evaluated throughout Chapter 4.4, Transportation, of the Draft EIR, while potential impacts related to GHG emissions are evaluated throughout Chapter 4.2, Greenhouse Gas Emissions. Noise is discussed in Section XIII of the IS prepared for the proposed project, which is located on page 77 through 85.

### **Response to Comment 19-4**

Please see Master Response 5.

### **Response to Comment 19-5**

Please see Master Response 1 regarding concerns related to potential trespassing issues and public pedestrian access through the off-site bridge connection.

### **Response to Comment 19-6**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 19-7**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 19-8**

Noise is discussed in Section XIII of the IS prepared for the proposed project, which is located on page 77 through 85. The discussion therein is based on a Noise and Vibration Assessment prepared for the project by Illingworth & Rodkin, Inc. (see Appendix D of the IS). Long-term and short-term noise measurements were taken as part of the Noise and Vibration Assessment, the locations of which are shown on Figure 14 of the IS on page 79, and the results of the short-term measurements are summarized in Table 8 of the IS on page 78.

In addition, as noted on page 4.4-1 of the Draft EIR, the information contained within Chapter 4.4, Transportation, is primarily based on the Focused Traffic Study prepared for the proposed project by W-Trans (see Appendix G of the Draft EIR). As discussed on page 4.4-15, W-Trans estimated per capita VMT associated with the proposed project using the Sonoma County Transportation Authority's (SCTA) travel demand forecast model (SCTM19). The model divides the County into over 800 transportation analysis zones (TAZs) and incorporates land use, demographic, socioeconomic, and transportation network data to estimate travel across different areas inside and outside of Sonoma County.

Finally, with respect to vehicle and pedestrian safety, please see Master Response 3.



**Letter 20**

**From:** [Christy Booth](#)  
**To:** [-- City Clerk](#)  
**Subject:** Comment on Creekwood Housing Development  
**Date:** Monday, September 16, 2024 12:05:16 PM

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**20-1**

Our family is new to Petaluma and we are residents of the Makenna development. We love that new apartments are being built, however, we are concerned about the practical impact of the current plan. Our primary concerns are the lack of parking, our privately managed walkway, and the dangerousness of Casa Grande Rd.

They're simply is not enough parking in the current plan.

**20-2**

With regards to the walkway, it is unfair that the city forced Makenna developers to install a walkway, with the residents of Makenna forced to pay for it. It's unjust that the walkway will now be part of the new development used widely by the public. Will the city be reimbursing us our HOA fees? Or will the city pay out of its own pocket to pave and upkeep this path?

**20-3**

As parents with a toddler, we are especially concerned about traffic on casa grande road. We would like to see improvements to casa grande before new developments are built. Vehicles drive far too fast down Casa Grande and there is no buffer between the road and the sidewalk, making it especially dangerous for small children.

Please address these issues before proceeding with the development.

Christy and Andre Owens



## **LETTER 20: CHRISTY AND ANDRE OWENS**

---

### **Response to Comment 20-1**

Please see Master Responses 3 and 5.

### **Response to Comment 20-2**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 20-3**

Please see Master Response 3.





**Letter 21**

**From:** [REDACTED] <[REDACTED]>  
**Sent:** Friday, September 6, 2024 4:58 PM  
**To:** Petaluma Planning <petalumaplanning@cityofpetaluma.org>; Greg Powell <gpowell@cityofpetaluma.org>  
**Cc:** Rick Parker <[REDACTED]>  
**Subject:** Creekwood Development EIR input

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---  
Greg, (and Planning Commission)  
Good afternoon

**21-1**

I'd like to provide official comment/input on the draft EIR. It's not clear on the website as to how to accomplish this so I'm sending it to you. Please let me know if this will be included by the September 9th deadline.

Several items need to be more clearly addressed in the Draft EIR:

**21-2**

The area has long been zoned for residential development and that is clearly understood. Petaluma is in great need of new housing.  
**The following issues however are not adequately addressed in the draft EIR.**

**21-3**

**Traffic issues**

- the proposed development is on the same street as Casa Grande Highschool and this makes a significant difference in terms of planning and impact of the project. This is not adequately addressed in the EIR.
- The project is located on Adobe creek and between the High School and the large Enclave / The Grove Apartment Complex. This is not adequately addressed.
- **For automobile traffic** the following needs to be addressed:
  - the very poor condition of the current pavement on Casa Grande Ave and Ely.
  - the lack of any on-street parking on the eastbound lanes of Casa Grande (and most of Ely) combined with the current overflow of parking on the west side of Casa Grande during school hours or special events. This issue is heightened in the Spring Semester (Jan-June) as many additional students receive their drivers licenses and drive to and park at school.

**21-4**

- **parking** at the existing developments on the east side of Casa Grande Ave is inadequate now before the Creekwood development  
Is even started. At the June 17, 2024 forum, numerous residents of both the Senior Housing Project and the newly finished Makenna project shared that current parking was not sufficient (with no parking on adjacent Casa Grande available). This forces current residents to park in other nearby neighborhoods or to park across the 4 lanes of busy traffic on Casa Grande.
- the developer shared on June 17th that the city is requiring a maximum of 1 car garages combined with minimal on street parking on the proposed new streets. This will cause additional overflow into other neighborhoods.





**Letter 21 Cont.**

<b>21-5</b>	<ul style="list-style-type: none"><li>- there are also <b>safety</b> issues as the Senior Housing development only has one exit to a paved street (Casa Grande) and in the event of evacuation this is problematic as the only way out and that if during school hours the street would be completely blocked with hundreds of cars attempting to exit.</li></ul>
<b>21-6</b>	<p><b>Walking traffic, pedestrians</b></p> <ul style="list-style-type: none"><li>- this issue is not addressed and for anyone involved in or <b>living near a High School this is a major issue.</b></li><li>- <b>The proposed walking bridge</b> over Adobe Creek would create a “highway” of students attempting to go from School, through the residential Makenna or Creekwood developments, over the bridge and into the fenced off back side of the Enclave/The Grove Apartments where many students live.</li><li>- The apartment complex and neighbors along the creek have observed over 30 years inappropriate traffic and use of this area to attempt to enter the Enclave complex by climbing over a metal fence (that has been repaired numerous times). Graffiti, trash, old couches used for “hang outs” and even fires (resulting in Petaluma PD/FD being called) have been part of that experience. To now provide a foot highway (for hundreds of students) directly from Casa Grande Highschool to the back of the fenced in Enclave / The Grove property is to invite serious problems and makes no sense to those familiar with the area.</li></ul>
<b>21-7</b>	<ul style="list-style-type: none"><li>- <b>there is a current, easy to use walking path</b>, all via sidewalks from Casa Grande to Ely that enters properly into the Enclave apartment complex. This route is used by hundreds of students each day and causes none of the issues outlined above that would be caused by the proposed bridge over Adobe Creek.</li></ul>
<b>21-8</b>	<p><b>Walking Bridge over Adobe Creek</b></p> <ul style="list-style-type: none"><li>- In addition to the comments above, encouraging hundreds of High School Students to transit Adobe Creek and the surrounding sensitive ecological area makes no sense in terms of the environment, safety and negative impact on existing homeowners.</li><li>- the current nearby paved street bridges over Adobe Creek on Ely Blvd. and Sartori Ave. invite young folks to graffiti, leave trash, old furniture, etc. in and around the creek. I can send photos if needed. A new foot bridge that is in the midst of trees and pretty much out of view of passing motorists will most definitely result in the same or even a much worse negative environmental impact on the creek and surrounding area and homes.</li><li>- the added cost of the bridge could possibly be used for enhanced parking or lowering the cost of the proposed homes.</li></ul>
<b>21-9</b>	<ul style="list-style-type: none"><li>- I believe City planners wish to connect walking paths along the creeks in Petaluma which in general makes sense, but not in this location, right across from a High School and next to a large apartment complex. Current hikers, including myself, simply traverse along Ely Ave. then turn and walk along Adobe Creek via Spyglass Rd then via path to Sartori Ave.</li></ul>
<b>21-10</b>	<p><b>Proposed 3 Story Development</b></p> <ul style="list-style-type: none"><li>- the plan calls for some 3 story Condos to be built. While understanding the need for affordable housing, simply stated, 3 story development</li></ul>



**Letter 21 Cont.**

- 21-10  
Cont.
- In residential areas of the East Side Community is not acceptable, and completely changes the look, feel, congestion and reason why we all love to live here.
- Impact on current residents and neighborhoods during construction is not addressed.**
- 21-11
- We all love our homes in Petaluma and know that new homes need to be built. That said, infill projects create a significant Environmental impact (noise, traffic, dust, debris, ant, rodent issues) that needs to be minimized, The Makenna development was under construction in one form or another for nearly three years in many of our "backyards". At 8AM, every day, pounding, equipment, back up beeping trucks, dust, noise, etc was a part of our daily lives. The building of the "water overflow basins" was extremely problematic as required construction continued for nearly a year after the homes were actually built. All this should be addressed in the project plan and implementation to minimize the negative environmental impact (and duration) on existing areas and homeowners and all Petaluma residents.
- 21-12
- Impact on native fish and the health of Adobe Creek should include input from the United Anglers of Petaluma (Casa Grande High school ).
- Thank you for your consideration.
- Rick Parker  
[REDACTED]  
Petaluma, CA. 94954  
[REDACTED]  
38 year Petaluma resident and homeowner along Adobe Creek



## **LETTER 21: RICK PARKER**

---

### **Response to Comment 21-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 21-2**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 21-3**

Please see Master Responses 3 and 5.

### **Response to Comment 21-4**

Please see Master Response 5.

### **Response to Comment 21-5**

Please see Master Response 3.

### **Response to Comment 21-6**

Please see Master Responses 1 and 3.

### **Response to Comment 21-7**

Please see Master Responses 1 and 2.

### **Response to Comment 21-8**

Please see Master Responses 1 and 4.

### **Response to Comment 21-9**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 21-10**

Please see Response to Comment 4-4 with respect to building heights.

### **Response to Comment 21-11**

Please see Master Response 1 with respect to general comments about environmental issues.

It should be noted that potential impacts related to the generation of substantial noise during project construction are evaluated under question XIII-a of the IS prepared for the proposed project. As discussed therein, construction of the proposed project would temporarily increase noise levels at adjacent receivers. Thus, the IS includes Mitigation Measure XIII-1, which would ensure that project construction activities incorporate standard noise control measures.

In addition, the IS discussed potential impacts related to dust emissions under question III-d on page 42. As discussed therein, the project would be required to implement the Bay Area Air Quality Management District's (BAAQMD) Basic Construction Mitigation Measures (BCMMS) during project construction. The BCMMS would act to reduce construction-related dust by requiring that haul trucks with loose material are covered, reducing vehicle dirt track-out, and limiting vehicle speeds within the project site, among other methods, which would ensure that construction of the project does not result in substantial emissions of dust.



**Response to Comment 21-12**

As discussed under Impact 4.1-3 on page 4.1-39 of the Draft EIR and according to the Biological Resources Assessment (BRA) prepared for the proposed project, a CDFW Stream Assessment found that Adobe Creek provides suitable fish habitat for anadromous species. In addition, the Draft EIR notes the presence of steelhead in the Creek, as recorded in the California Natural Diversity Database (CNDDDB), as well as by the United Anglers of Casa Grande, Inc. The activities of the United Anglers of Casa Grande, Inc. are also acknowledged on page 4.1-17 of the Draft EIR. Furthermore, the Draft EIR includes Mitigation Measures 4.1-3(a) through 4.1-3(c) to ensure that potential impacts to steelhead are reduced to a less-than-significant level. Therefore, the proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on anadromous fish, including steelhead.





**Letter 22**

**From:** [Susan Price](#)  
**To:** [City Clerk](#)  
**Subject:** Item 12 Creekwood Development  
**Date:** Monday, September 16, 2024 2:08:08 PM

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---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

22-1

PLEASE when you consider the EIR Report tonight, kindly consider the hundreds of residents, trees and animals that will be negatively affected by your decision. **Please do not approve this EIR REPORT.**

22-2

The fear of the outrageous building of so many apartments, condos and homes being built just outside my apartment is horrid and frightening to me and so many others. I live in Casa Grande Apts, a PEP Senior Housing complex, and have been so very grateful to have lived here 5 years. My main love of this area is the sheep I get to see everyday from my window. It is one of the few pleasures I and my elderly neighbors have left.

22-3

There are so many lots in Petaluma much more suitable for this project then this now beacoloc area here on Casa Grande Road. What about the two areas on either side of D Street East and Lakeville? Plenty of space now surrounded by ugly chainlink fences. Or the area at Petaluma Blvd South up in the hills?

22-4

The 500 cars that will be driving up and down my front street to work, school and errands is frightening. To cross the street on foot or in a car is difficult and even terrifying now. If that many daily vehicles are added to the mix, I shudder to think of it.

When Casa Grande HS lets out in the afternoon, the cars are lined up for 3 blocks as it is. It's dangerous for those students who rarely look up from their phones when crossing the street. 500 more cars will most definitely cause many more accidents to these teenagers.

22-5

The homes that were built on Casa Grande a year or so ago are all having problems...something wrong with the water, not enough parking on the street, impossible to pass on their front street. They are shoved together...Its ghastly. Please don't add to that mess.

22-6

Please take this project elsewhere. Please, at the very least, do not have any structures 3 stories high at the border of the Pep property. It's clostrafobic for everyone and especially for the residents of Casa Grande Apts. Please don't ruin the little bit of happiness we have in our declining years. It's so sad and its depressing. It's difficul to fathom.

22-7

Again, at the very very least, take care for the trees that line the



**Letter 22 Cont.**

**22-7  
Cont.**

perimeter of Pep's property with a fence behind them and the now sheeps grazing property. Please do not allow your bulldozers to dig in that area at least 6" from them or you will damage the roots causing still more trees to tumble.

Afterall, Petaluma is known for its beautiful old buildings, homes and pastures. Why ruin it?????

***Susan Price***

***3 P's in a Pod***

*Publicity*

*Professional Organizer*

*Personal and Virtual Assistant*

*Join my [3 P's in a Pod](#) group on Facebook.*





## **LETTER 22: SUSAN PRICE**

---

### **Response to Comment 22-1**

The comment does not specifically address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 22-2**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 22-3**

As discussed on pages 6-7 and 6-8 of the Draft EIR in Chapter 6, Alternatives Analysis, the California Supreme Court determined that an EIR for a residential development consistent with planning policies of an adopted redevelopment plan did not need to examine alternative sites for the project (*Mira Mar Mobile Community v. City of Oceanside*, 2004, 119 Cal.App.4th 477). The proposed project is consistent with the City's existing land use designation of Medium Density Residential and zoning designation of R4. Additionally, the project site is identified for housing in the City's adopted Housing Element. As such, a review of alternative sites for the proposed project was not necessary, and the Off-Site Alternative was dismissed from detailed evaluation.

The alternative sites suggested by the commenter are not feasible alternative site locations. The area at D Street East and Lakeville Street is designated Mixed Use, and, thus, the proposed project would not be consistent with the existing land use designation. With respect to Petaluma Boulevard South, the area is currently developed or designated for proposed City parks. Additional sites along Petaluma Boulevard South are located outside current City boundaries, and would require additional approvals not currently associated with the proposed project.

### **Response to Comment 22-4**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 3.

### **Response to Comment 22-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1 with respect to the scope of the Draft EIR, Master Response 3 with respect to Casa Grande Road concerns, and Master Response 5 with respect to parking.

### **Response to Comment 22-6**

Please see Response to Comment 4-4.

### **Response to Comment 22-7**

The comment does not specifically address the adequacy of the Draft EIR. Notwithstanding, the commenter's concern is addressed in Appendix D to the Draft EIR. According to Appendix D to the Draft EIR (pg. 5), the row of English oak trees on the senior living property was in leaf-off condition during the time of the arborist assessment. However, the trees appear to be in good health and structural condition. An existing fence separates this row of trees from the project area. Only small branches from these trees extend over the property line, which may require some minor pruning to accommodate the proposed project. These trees are not expected to be negatively impacted by development. This cultivar of English oak has an upright/columnar form and can be pruned to maintain clearance from structures over the long term. Appendix D to the Draft EIR demonstrates compliance with IZO Chapter 17.07, which imposes requirements for tree



removal and protection through preparation and implementation of a Tree Protection and Preservation Plan.



**Letter 23**

**From:** Caroline Purtell <[REDACTED]>  
**Sent:** Sunday, September 8, 2024 9:07 PM  
**To:** Greg Powell <gpowell@cityofpetaluma.org>; Petaluma Planning <petalumaplanning@cityofpetaluma.org>  
**Subject:** proposed Creekwood housing development

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Dear Petaluma City Council,

23-1

I'm writing to share my concerns about the Creekwood Housing Development planned near our neighborhood. While I understand the need for growth, I think this project could bring up some real challenges that could affect our community's safety and quality of life.

23-2

**Traffic and Safety:**

Casa Grande High School already has traffic and safety issues, especially during school hours. With nearly 1,900 students, adding another development without addressing these problems first will only make things worse. I'd suggest conducting a thorough traffic study before moving forward.

23-3

**Parking Issues:**

Fairway Meadows, where I live, already struggles with parking. We frequently have people from nearby areas (such as the adjacent condominiums) parking in our streets, and this new development could add to that issue (especially with the proposed pedestrian bridge) unless there's a solid plan in place. We'd appreciate it if the city could ensure the new development has abundant parking for its residents.

23-4

**Infrastructure and Maintenance:**

I've lived here since 1997 and have watched the maintenance of our streets and common areas slowly decline—roads deteriorate (drive the stretch of Ely between Casa Grande and Frates), landscaping is neglected. It makes me wonder if the city can handle the extra infrastructure demands this new project will bring. Can the city ensure that existing roads will be maintained and that the funds from the new development will be used to improve infrastructure we already have?

23-5

**Environmental Impact:**

The area around Adobe Creek is an important habitat for local wildlife. I'm concerned that this development could harm that environment and increase foot traffic through our neighborhood. Has the city done a full environmental review, and can you confirm the creek's ecosystem will be protected?

23-6

Many of my neighbors share these concerns. I hope the city council will take the time to consider the long-term impacts of this development on those of us who already live here. We'd appreciate it if the needs and safety of existing residents are prioritized as part of





**Letter 23 Cont.**

**23-6  
Cont.**

this decision. I've attached a few photos, which I feel are self-explanatory, to underscore some of my above concerns.

Thank you for your time and consideration. I hope our voices will make a difference.

Sincerely,

Caroline Purtell

Petaluma CA 94954





**Letter 23 Cont.**





**Letter 23 Cont.**





**Letter 23 Cont.**





**Letter 23 Cont.**



## **LETTER 23: CAROLINE PURTELL**

---

### **Response to Comment 23-1**

The comment is an introductory statement and does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 23-2**

Please see Master Response 3.

### **Response to Comment 23-3**

Please see Master Response 5.

### **Response to Comment 23-4**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1. Additionally, the City imposes development impacts fees, inclusive of a traffic development impact fee, which is used to maintain and improve public roadways in accordance with the City's circulation plan.

### **Response to Comment 23-5**

Please see Master Response 4.

### **Response to Comment 23-6**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.



**Letter 24**

**From:** Frank Quint <[REDACTED]>  
**Sent:** Friday, September 6, 2024 7:11 PM  
**To:** Orozco, Uriel <uorozco@cityofpetaluma.org>  
**Cc:** Greg Powell <gpowell@cityofpetaluma.org>; Peggy Flynn <pflynn@cityofpetaluma.org>  
**Subject:** Fwd: my comments on the Creekwood Housing DEIR

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**24-1**

My name is Frank Quint, and we have owned our home near Del Oro Park since 2010. Please consider my comments on the proposed Creekwood Housing Development Draft EIR in this email. I support this development project, as this site is well-suited for residential development.

I also support the addition of the bridge providing access to the Adobe Creek Trail. The trail could offer access to other amenities such as Del Oro Park, the Plaza at the Lakeville Bussiness Park, and Schollenberger Park. However, Adobe Creek Trail is an informal trail in poor condition, use by the surrounding community is limited. I urge the city to develop and improve Adobe Creek Trail in conjunction with this project.

**24-2**

I am concerned about the location of the bridge as planned and propose the bridge be positioned away from homes located at the south end of Spyglass Rd. There is a history of tension between The Grove Apartments and the neighborhoods surrounding the apartments. This tension was amplified when residents from nearby neighborhoods sought to voice their concerns to The Grove Apartment management only to be turned away. Residents in the Spyglass neighborhood have experienced residences from The Grove Apartments breaking the fence to walk through the Spyglass neighborhood. The planned location is near where the fence was broken in the past. Spyglass Rd residents are concerned the bridge will encourage further fence destruction with foot traffic passing close to homes (unnecessarily).





**Letter 24 Cont.**

This picture shows the planned bridge location and the site of the fence breaking.



Site of the fence breakage.

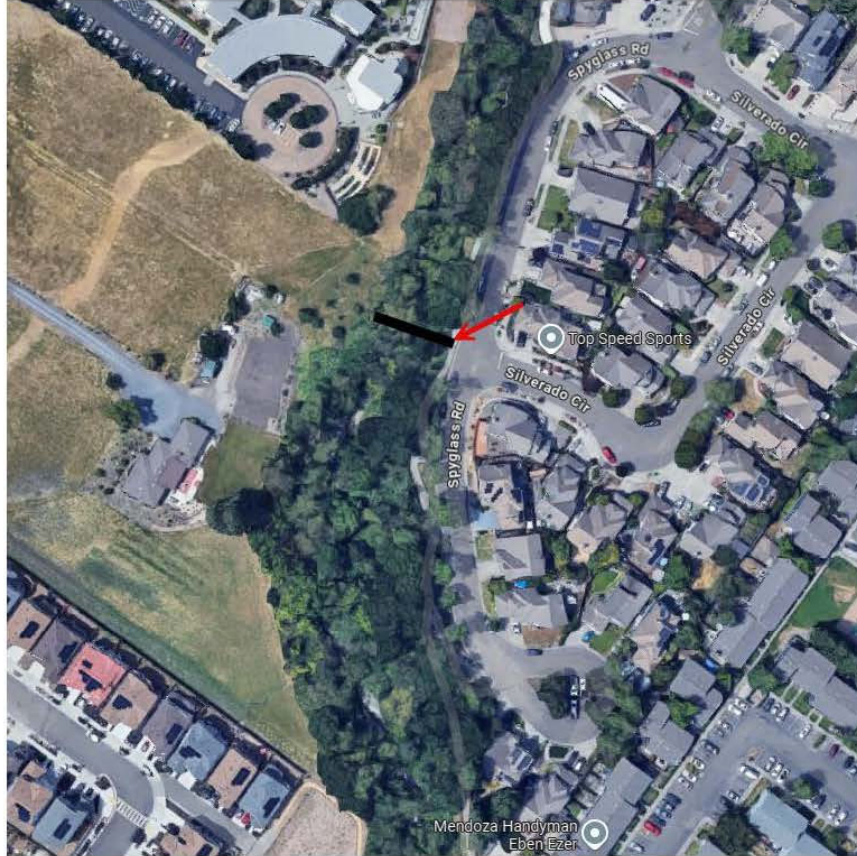




**Letter 24 Cont.**

**24-3**

An alternative site for the bridge that can mitigate some of the concerns.



**24-4**

Regarding nearby Del Oro Park. The neighborhood has seen an increase in the use of Del Oro Park with the completion of the Casa Grande development. This project will bring more users to the park (which is a good thing) and as such any development fees earmarked for Parks and Rec should be dedicated to improving Del Oro Park.

**24-5**

Public Art: Any development fees from this project earmarked for public art should be used in the vicinity of the project (i.e. near Casa Grande HS).

**24-6**

Concerning affordable housing, I agree with the points shared by Alicia Wolf. "The proposed project includes the bare minimum for inclusionary housing, which is that 15% of the units (i.e., 8.85 of the 59 units) be set aside for affordable and low-income households. It is suggested - though not explicitly stated - that those units would be located on the project site. As the affordable housing crisis has reached crisis levels throughout CA and we experience the negative effects of that here in Petaluma, a project



**Letter 24 Cont.**

**24-6  
Cont.**

of this scale should be required to go beyond the bare minimum and include a number closer to 25% inclusionary housing (14.74 units).

The Draft EIR should explicitly state whether the units will be provided on-site, and that they would be integrated throughout the site plan design (as opposed to grouped in one area). The Draft EIR should examine an additional Alternative, which is a modified Affordable Housing Alternative that includes either 25% inclusionary housing on site OR 15% inclusionary housing on-site with an additional 10% as a contribution to the affordable housing development fund, which funds affordable housing development in Petaluma."

**24-7**

I also agree with Alicia Wolfs's comments about Casa Grande Road. "The proposed project does not include any improvements to Casa Grande Road, despite adding many new residents as well as new road connections that will generate additional pedestrians and bicyclists from the surrounding neighborhoods, which will likely use it to access Casa Grande HS and nearby Wiseman Park. Casa Grande Road's current design is suited to the primarily agricultural area that previously existed here. Cars travel at high speeds, and unfortunately, vehicle-pedestrian accidents are frequent along this corridor. The Safe Routes to School study identified a number of proposed measures to increase pedestrian safety, and the recently-constructed residential development adjacent to the project site installed one of those measures (a new lighted pedestrian crosswalk). Due to the rapidly changing character of this area, with higher-density residential construction and new road connections that will generate additional pedestrian and bicycle trips to Casa Grande HS, transit stops, and nearby recreational amenities, the City of Petaluma should be implementing traffic calming measures along Casa Grande Road. With respect to this development project, the developer should be required to include some design measures to increase bicycle and pedestrian safety along Casa Grande Road, such as a Class IV separated bicycle lane."

**24-8**

Related to the Traffic Impact. I believe the Draft EIR may understate the impact during peak AM and PM hours. With 58 additional homes and 179 parking spaces, 36 AM and 46 PM trips during peak hours seem low. This is important because this development is across the street from a High School where traffic is an issue at the beginning and end of school days. This development is also next door to a high-density senior living facility where most residents continue to drive. This is all to say that safety on Casa Grande Rd is already an issue and this project will exacerbate it without improvements.



**Letter 24 Cont.**

**24-8  
Cont.**

<b>Table 4.4-1 Project Trip Generation</b>											
<b>Land Use</b>	<b>Units</b>	<b>Trip Generation</b>									
		<b>Daily</b>		<b>AM Peak Hour</b>				<b>PM Peak Hour</b>			
		<b>Rate</b>	<b>Trips</b>	<b>Rate</b>	<b>Trips</b>	<b>In</b>	<b>Out</b>	<b>Rate</b>	<b>Trips</b>	<b>In</b>	<b>Out</b>
Single Family (Detached)	35	9.43	330	0.70	25	6	19	0.94	33	21	12
Single Family (Attached)	24	7.20	173	0.48	12	3	9	0.57	14	8	6
Homes to be Demolished	-1	9.43	-9	0.70	-1	0	-1	0.94	-1	-1	0
<b>Total</b>		--	<b>494</b>	--	<b>36</b>	<b>9</b>	<b>27</b>	--	<b>46</b>	<b>28</b>	<b>18</b>
<i>Source: W-Trans, 2022.</i>											

**24-9**

Concerning construction noise mitigation. Requiring "quiet" air compressors and capping idle time at 5 minutes is not sufficient. Air compressors should be rated at 60 dB or less, motorized blowers should also be rated at 60 dB or less (electric), and the idling of vehicles and construction equipment should be prohibited.

Thanks  
Frank Quint  
[REDACTED]



## **LETTER 24: FRANK QUINT**

---

### **Response to Comment 24-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 24-2**

The comment does not address the adequacy of the Draft EIR. Please see Master Responses 1 and 2. Additionally, the City collects development impacts fees which are levied to fund maintenance and development of City infrastructure, including multi-use pathways such as the Adobe Creek Trail.

### **Response to Comment 24-3**

Please see Master Response 2.

### **Response to Comment 24-4**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1. In addition, as discussed under question XV-d on page 90 and 91 of the IS prepared for the proposed project, the project would be subject to the City's Park Land Development Impact Fee and Park Land Acquisition In-Lieu Fees. Revenues generated through the project's payment of fees would pay the project's fair share towards park facility improvements deemed necessary by the City, which would ultimately decide how such revenues are used.

### **Response to Comment 24-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1. As discussed above, use of development fees is decided at the City's discretion. Please note that Section 18.100 of the IZO "Location of Public Art" requires the art to be displayed on or adjacent to the construction project and visible or accessible to the public.

### **Response to Comment 24-6**

It should be noted that the Draft EIR identifies the proposed inclusionary housing on page 3-1. As stated therein, the project would reserve 15 percent of the proposed 59 dwelling units, which would be located on-site, as Below Market Rate (BMR) units. The quantity of BMR units is consistent with IZO Section 3.040.

As discussed on page 6-1 of the Draft EIR, the primary intent of the alternatives evaluation, as stated in Section 15126.6(a) of the CEQA Guidelines, is to "[...] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." As further stated in Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather, the EIR shall consider a reasonable range of potentially feasible alternatives that would be capable of avoiding or substantially lessening any significant effects of the project.

Chapter 6, Alternatives Analysis, of the Draft EIR includes an analysis of an Affordable Housing Alternative, under which the 59 proposed residential units would be offered as affordable housing. As discussed on pages 6-13 and 6-14 of the Draft EIR, adding affordable housing generally improves the jobs-housing match and shortens commutes, thereby reducing VMT. Additionally, even in areas where the existing jobs-housing match is closer to optimal, affordable housing is





still shown to generate less VMT than market-rate housing. Therefore, because affordable housing can be reasonably assumed to reduce VMT, the Affordable Housing Alternative would result in fewer impacts related to GHG emissions and transportation as compared to the proposed project. In addition, the significant and unavoidable impacts related to GHG emissions and transportation that would occur under the proposed project would be eliminated. Because the alternatives proposed by the comment include offering a smaller portion of the proposed units as affordable, the potential reduction to the identified impacts related to GHG emissions and transportation would be proportionately less than the Affordable Housing Alternative analyzed in Chapter 6 of the Draft EIR.

#### **Response to Comment 24-7**

Please see Master Response 3.

#### **Response to Comment 24-8**

Please see Master Response 3. In addition, as discussed on page 4.4-15, the trip generation for the proposed project was calculated using the rates published in the 11<sup>th</sup> Edition Trip Generation Manual prepared by the Institute of Transportation Engineers. The applicable land use for the proposed single-family units and the residence to be demolished is category 210 (Single Family Detached Housing), and the applicable rate for the proposed townhome units is category 215 (Single Family Dwellings [Attached]). Application of the foregoing trip generation rates yields a net total of 494 daily trips with 36 trips expected in the AM peak hour and 46 trips generated during the PM peak hour, as shown in Table 4.4-1.

#### **Response to Comment 24-9**

The noise control measures contained within Mitigation Measure XIII-1, as included on page 82 of the IS prepared for the proposed project, are standard construction noise control measures that are sufficient to minimize construction noise. The comment does not provide justification for why the suggestions for mitigation should be included beyond the standard measures. As such, additional noise reduction measures are not required, but will be forwarded to the decision-makers for consideration.





**Letter 25**

**From:** Sanatan Sahgal <[REDACTED]>  
**Sent:** Monday, September 9, 2024 3:31 PM  
**To:** Orozco, Uriel <[uorozco@cityofpetaluma.org](mailto:uorozco@cityofpetaluma.org)>; -- City Clerk  
<[cityclerk@cityofpetaluma.org](mailto:cityclerk@cityofpetaluma.org)>  
**Subject:** Public Comment on the Draft Environmental Impact Report for the Creekwood Housing Development

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---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

- 25-1 Dear City of Petaluma Planning Commission,  
I appreciate the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Creekwood Housing Development project. While I understand and support the need for housing and the importance of addressing environmental concerns, I have serious reservations regarding the impact this development may have on parking availability and neighborhood harmony.
- 25-2 Specifically, I am concerned about the insufficient planning for garages and parking spaces within the proposed development. If the new residences do not have adequate parking—either through small or no garages and limited off-street spots—there will inevitably be overflow parking into nearby neighborhoods such as Del Oro and Del Rancho Way. These neighborhoods already experience limited street parking, and the current situation often leads to full streets during peak times. Introducing additional vehicles without properly addressing parking needs will exacerbate an already strained situation, leading to parking disputes and tension among neighbors.
- 25-3 This is not merely an issue of convenience; it affects the quality of life and the overall sense of community. Neighborhood relations can be harmed when parking overflows into residential areas not designed for high volumes of vehicles. The increase in congestion could result in diminished harmony between residents and create long-term frustration.
- 25-4 Additionally, restricted parking may cause safety concerns, including limited accessibility for emergency vehicles and increased traffic congestion.
- 25-5 While I understand the environmental priorities of the DEIR—such as reducing greenhouse gas emissions and promoting walkability—this must be balanced with the practicalities of daily life. A lack of parking space can negate some of these environmental benefits by forcing residents to drive around longer searching for parking, thus increasing vehicle miles traveled (VMT) and emissions. Therefore, I believe the DEIR should consider a more comprehensive plan for mitigating these parking issues.
- In closing, I urge the Planning Commission to ensure that the final Environmental Impact Report includes solutions for adequate parking both within the Creekwood development and the surrounding neighborhoods. These solutions should aim to promote sustainable growth while maintaining the harmony and quality of life for all nearby residents.
- Thank you for considering these concerns.
- Sincerely,  
Sanatan Sahgal  
Resident of Del Rancho Way



## **LETTER 25: SANATAN SAHGAL**

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### **Response to Comment 25-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 25-2**

Please see Master Response 5.

### **Response to Comment 25-3**

Please see Master Response 3 with respect to safety concerns and emergency access, and Master Response 5 with respect to parking. In addition, please see Response to Comment 24-3 with respect to congestion.

### **Response to Comment 25-4**

Please see Master Response 5.

### **Response to Comment 25-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.



**Letter 26**

From: [REDACTED] <[REDACTED]>  
Sent: Tuesday, September 10, 2024 8:48 AM  
To: Greg Powell <gpowell@cityofpetaluma.org>  
Subject: Creekwood Development

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Dear Sir,

Please find attached the letter regarding Creekwood Housing Development.

Regards,

B. Sorensen



**Letter 26 Cont.**

Brenten Sorensen & Sorensen Family

██████████  
Petaluma, CA 94954

Regarding: 270 & 280 Casa Grande Road Creekwood Housing Development Project

Dear Creekwood Housing Development,

**26-1**

I am writing to express my objection to the installation of a pedestrian bridge over Adobe Creek to connect with the existing Creekside path on the opposite bank over Adobe Creek that would link the proposed multi-use walkway with the residential neighborhoods to the east of the project site, allowing pedestrian access from these neighborhoods. This would result in increased parking and traffic in our cul-de-sac, where my young children and others play, making it unsafe for them to be outside due to the increased traffic and use of the side street for parking. Additionally, this access would likely encourage overflow parking from the mixed housing units, and we wish to preserve our cul-de-sac for future generations.

On any given day, parking for the neighborhood residents is already at capacity, and adding a walking trail would only encourage overflow parking from the Creekwood Housing Development. There is already a trail in the area that residents can use; therefore, the walking bridge is not necessary to connect the Creekwood Housing Development to our cul-de-sac.

**26-2**

Furthermore, Adobe Creek is home to various wildlife, including owls and foxes to name a few. It is the site where some owls were re-homed, and the addition of this walking path will be detrimental to their habitat.

**26-3**

The proposed walking path and extra foot traffic, along with the debris it will bring, would significantly impact the natural beauty of Adobe Creek.

**26-4**

I oppose the construction of this walking path and urge the reconsideration of this proposal.

Sincerely,

Brenten Sorensen

████████████████████  
██████████



## **LETTER 26: BRETEN SORENSEN**

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### **Response to Comment 26-1**

Please refer to Master Response 5 with respect to parking. In addition, please see Master Response 2 related to the multi-use bridge. Master Response 1 includes a section responding to concerns related to potential public pedestrian access through the off-site bridge connection.

### **Response to Comment 26-2**

Please see Master Response 4.

### **Response to Comment 26-3**

Please see Master Response 4.

### **Response to Comment 26-4**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.





**Letter 27**

**From:** [MARILYN SULLIVAN](#)  
**To:** [-- City Clerk](#)  
**Subject:** Creekwood Housing Development  
**Date:** Tuesday, September 10, 2024 1:08:17 PM

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- |             |                                                                                                                                                                                                                                                                                                                                  |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>27-1</b> | This e-mail addresses my concerns and opposition to the density of the Creekwood Housing Development project proposed to be built along Casa Grande Road. This high density development will most certainly have an environmental impact on the immediate area in terms of resources used, traffic and gas emissions.            |
| <b>27-2</b> | There is a seasonal creek that will also be impacted. The site proposed is presently an open space lot where sheep graze - an integral part of the Petaluma landscape.                                                                                                                                                           |
| <b>27-3</b> | The Creekwood development does not have any open space, a park or adequate parking. The public trail proposed does not equal a park or a place for people to gather. This project just offers "stack and pack" type housing offering only dollars for the developer and tax dollars for the city and county.                     |
| <b>27-4</b> | Also, this area has already experienced a housing project (Makena Homes) taking the place of an open, agricultural space where sheep once grazed. Due to the density of the Makena Homes project, traffic and parking has overflowed into the Casa Del Oro neighborhood.                                                         |
| <b>27-5</b> | In essence, small agricultural areas are being given up for monetary gain, thereby changing key elements that make up the unique Petaluma landscape. Please consider a "No Project" vote on this project or at the very least, less density in terms of single family homes that will fit in with the rest of the neighborhoods. |



## **LETTER 27: MARILYN SULLIVAN**

---

### **Response to Comment 27-1**

Potential impacts related to transportation, including conflicts with a program, plan, ordinance, or policy, addressing the circulation system, conflicts or inconsistencies with CEQA Guidelines Section 15064.3, subdivision (b), increasing hazards to vehicle safety, or resulting inadequate emergency access, are evaluated throughout Chapter 4.4, Transportation, of the Draft EIR.

Potential impacts related to GHG emissions, including the generation of GHG emissions that may have a significant impact on the environment and conflicts with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, are evaluated throughout Chapter 4.2, Greenhouse Gas Emissions, of the Draft EIR.

Because the comment does not include specific project impacts, further response is not required. Please also see Master Response 1.

### **Response to Comment 27-2**

Please see Master Response 4.

### **Response to Comment 27-3**

Please see Response to Comment 24-4.

### **Response to Comment 27-4**

Please see Master Response 5.

### **Response to Comment 27-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.



**Letter 28**

**From:** [Melinda Tran](#)  
**To:** -- City Clerk  
**Subject:** Creekwood Development  
**Date:** Monday, September 16, 2024 3:57:32 PM

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Hello,

- |             |                                                                                                                                                                                                                                                                                                                                 |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>28-1</b> | I am writing today as a concerned citizen of Petaluma and neighbor to this planned development. There are issues that need to be addressed before development can proceed.                                                                                                                                                      |
| <b>28-2</b> | 1. The proposed bridge and connected pathways need better planning                                                                                                                                                                                                                                                              |
| <b>28-3</b> | 2. Safety of residents due to increased traffic in the area<br>3. The amount of parking intended is far to low to support the amount of units that are planned<br>These are some of my top concerns but there are other issues as well. Please take this into consideration before the continuation of this project. Thank you. |

Sincerely,  
Melinda and Jimmy Tran



## **LETTER 28: MELINDA AND JIMMY TRAN**

---

### **Response to Comment 28-1**

Please see Master Response 2.

### **Response to Comment 28-2**

Please see Master Response 3.

### **Response to Comment 28-3**

Please see Master Response 5.



**Letter 29**

**From:** [Megan Turrell](#)  
**To:** -- City Clerk  
**Subject:** creek wood development  
**Date:** Monday, September 16, 2024 2:21:05 PM

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**29-1**

Good Afternoon,  
I live in the casa grande area and have some concerns with the proposed development. I am not opposed of additional housing, as I know we need more homes for our families. I have a few concerns about the lack of parking. I live in the new Mackenna development and can share first hand that our community is already competing for parking spaces. The reality is, most home owners have 2-3 cars at minimum. The proposed creek wood has even less parking available, one side is going to be completely red and only one with its only going to create more of a competition for parking.

**29-2**

As for the pedestrian pathway I think it's pretty outrageous that the city of Petaluma is asking private homeowners to maintain a public easement. The current pathway at MaKenna is not built for high traffic/volume that will receive this project proceeds. It's the NOT the city who will have to pay for the upkeep of the path but it's homeowners. I also think safety should be looked at as the path aren't wide enough for both pedestrians and cyclists who are bound to also use the path. There are many young children around and someone is likely to get hurt, but again the homeowners would be held responsible for any major injuries as it's on our property.

**29-3**

Finally I hope that the city planners consider the entrances the proposed development. Mackennas is extremely narrow and can only allow one car at time. This is extremely unsafe as traffic on casa grande goes pretty fast and we have already seen multiple accidents already. At least three cars have driven over the the curb and gotten stuck into the drainage area. Please consider making casa grande 1 lane for traffic, including turning lanes and allow parking on one side of traffic, this will help the senior apartments at 400 casa grande. Hopefully the proposed development will be able turn both right and left and I know the senior housing only has one way exit which is concerning if there's a need for evacuation.

Thank you for your time,  
Megan Turrell

Sent from my iPhoneb





## **LETTER 29: MEGAN TURRELL**

---

### **Response to Comment 29-1**

Please see Master Response 5.

### **Response to Comment 29-2**

Please see Master Response 1.

### **Response to Comment 29-3**

Please see Master Response 3.



Letter 30

		Petaluma / Sonoma County	Edward OSS
		(1) City Council Meeting @ 6 PM	
30-1	(2)	Dennis Posen neh	16 SEPT '24 Council Member
	(3)	Exclusionary Rule - City Rule is 70 Just not in on Affordability City will be sued! S.B. 330 rule Senate Bill	
		Corporation Developer's Name ! ???	
30-2	(4)	<VMT> → Vehicle Miles Travelled	to
	(5)	(per day ?)	your job
30-3		Vie on medical	Bridge? (Medina Development) Wheel Chair
30-4	(6)	Casa Grande Students / Care about the sheep!	
30-5		Bridge Metacrition	Army Corps of Engineers
	(7)	200 more cars a days + Deliveries	See Map!
30-6		Bridge	Written Comment: City Clerk @
		Item 12 Creekwood	Petaluma City Council by 4 pm today!
30-7		Deny or not DNI. or revisions	(8) Wild life here is <del>not</del> significant !!!



Letter 30 Cont.

30-8	(9) 553. w/ the planning commission! ↓ Battery's for ? PG+E? near PG+E Yard!
30-9	(10) Casa Grande RD. Two Lanes vs Four! for more cars!



## **LETTER 30: UNKNOWN**

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### **Response to Comment 30-1**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1. It should be noted that Senate Bill (SB) 330 changed land use and zoning laws to remove barriers and impediments to building new housing. Under the revised laws, cities and counties are prohibited from disapproving or blocking a housing development project for very low, low-, or moderate-income households unless the lead agency can prove that a project is inconsistent with both the applicable land use and zoning designations. The proposed project would be consistent with both the land use designation of Medium Density Residential and the R4 zoning designation, but the majority of the proposed units would be offered at the market rate. As discussed on page 3-17 of the Draft EIR, 15 percent of the proposed units would be Below Market Rate (BMR).

### **Response to Comment 30-2**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 30-3**

The comment does not address the adequacy of the Draft EIR. With respect to the multi-use bridge, please see Master Response 2.

### **Response to Comment 30-4**

The comment does not address the adequacy of the Draft EIR. With respect to Casa Grande Road and potential safety impacts, please see Master Response 3.

### **Response to Comment 30-5**

The comment does not address the adequacy of the Draft EIR. With respect to the multi-use bridge, please see Master Response 2. It should be noted that the Draft EIR requires implementation of Mitigation Measure 4.1-8(b), which requires the project proponent to submit a formal Aquatic Resources Delineation to the U.S. Army Corps of Engineers (USACE). If required by USACE, the project proponent shall also apply for a Clean Water Act (CWA) Section 404 permit from the USACE. Waters that would be lost or disturbed shall be restored, replaced, or rehabilitated on a “no-net-loss” basis.

### **Response to Comment 30-6**

With respect to the multi-use bridge, please see Master Response 2. With respect to trip generation, see Response to Comment 24-8.

### **Response to Comment 30-7**

As the comment does not specify which area of the project site contains significant wildlife, nor what wildlife species are anticipated, specific responses are not feasible. Please see Master Response 4 for concerns related to the Adobe Creek riparian corridor. In addition, potential impacts related to special-status wildlife species are evaluated in Chapter 4.1, Biological Resources, of the Draft EIR. As discussed under Impacts 4.1-2 through 4.1-6, potential impacts to protected species likely to occur on-site would be less than significant or reduced to less-than-significant levels with implementation of the mitigation measures therein including acquisition and compliance with state regulatory agency requirements through the permitting review and approval process.



**Response to Comment 30-8**

As discussed on page 3-11 of the Draft EIR, electrical service would be provided to the project by Pacific Gas and Electric Company (PG&E) using the existing aboveground transmission lines located along Casa Grande Road, adjacent to the project site's western boundary. All other new utility infrastructure would be installed below grade. The comment does not address the adequacy of the Draft EIR.

**Response to Comment 30-9**

Please see Master Response 3.





**Letter 31**

-----Original Message-----

From: Nicole Wehr <[REDACTED]>  
Sent: Friday, September 6, 2024 3:42 PM  
To: Greg Powell <gpowell@cityofpetaluma.org>  
Cc: Michael Freeman <[REDACTED]>  
Subject: Creekwood Housing Development- public comment

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

**31-1**

On behalf of the Home Owners Association and on behalf of the safety of the residents living next to this project site, we want answers to the following points:

1. Is the existing ground where the project lot site is polluted or are there toxic elements in the ground?
2. And if so, how will they be addressed?

Please respond to these questions of concern at your earliest convenience.

Respectfully,  
Nicole Wehr



## **LETTER 31: NICOLE WEHR**

---

### **Response to Comment 31-1**

The comment does not specifically address the adequacy of the Draft EIR. Please see Master Response 1. In addition, as discussed under question IX-d of the IS prepared for the proposed project, the project site is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, development of the proposed project would not create a significant hazard to the public or the environment related to existing hazards or hazardous materials. See Response to Comments 2-2 through 2-5.



**Letter 32**

**From:** [Nicole Wehr](#)  
**To:** -- City Clerk  
**Cc:** [Matthew Wehr](#)  
**Subject:** Concerns Creekwood housing development  
**Date:** Monday, September 16, 2024 3:54:18 PM

---

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---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM ---

- |             |                                                                                                                                                                                                                                                                                                                                                 |
|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>32-1</b> | We are residents of Makenna Development. We are very concerned about the safety and practical impact of the current Creekwood housing plan. Our primary concerns are Casa Grande road is already a very very dangerous road. And we have extreme concerns about how the new development will make things even more dangerous.                   |
| <b>32-2</b> | There's also not nearly enough parking in the current plan.                                                                                                                                                                                                                                                                                     |
| <b>32-3</b> | We also have concerns about the proposed walking paths which are not designed to support accessibility for people with disabilities and in wheelchairs.                                                                                                                                                                                         |
| <b>32-4</b> | The walking paths are too narrow.<br>Private citizens should not be responsible for paying for the maintenance and upkeep of these pathways, especially if you are making them to be a public pathway.                                                                                                                                          |
| <b>32-5</b> | As parents with two young boys, who wait daily on Casa Grande Road for their school bus to pick them up and take them to school, we are incredibly concerned about the safety and traffic on Casa Grande Road.<br><br>We would like to know how you're going to address these issues of safety concern before you proceed with the development. |
- Respectfully,  
Matt and Nicole Wehr



## **LETTER 32: MATT AND NICOLE WEHR**

---

### **Response to Comment 32-1**

The comment does not specifically address the adequacy of the Draft EIR. Please see Master Response 3.

### **Response to Comment 32-2**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 5.

### **Response to Comment 32-3**

As described on page 3-13 of the Draft EIR, the multi-use pathway would be 10 feet in width and installed along the project site's eastern boundary, and extended west over Adobe Creek. According to the ADA Guidelines, Chapter 4: Accessible Routes, the continuous clear width of an accessible route must be at least 36 inches, or three feet. Therefore, the proposed 10-foot pathway would be sufficiently wide to support wheelchair accessibility.

### **Response to Comment 32-4**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 32-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 3.



**Letter 33**

**From:** Alicia [REDACTED] >  
**Sent:** Thursday, September 5, 2024 2:32 PM  
**To:** Orozco, Uriel <uorozco@cityofpetaluma.org>  
**Cc:** Greg Powell <gpowell@cityofpetaluma.org>; Kevin McDonnell <kmcdonnell@cityofpetaluma.org>; John Shribbs <jshribbs@cityofpetaluma.org>; Barnacle, Brian <bbarnacle@cityofpetaluma.org>; Mike Healy <mhealy@cityofpetaluma.org>; Karen Nau <knau@cityofpetaluma.org>; Dennis Pocekay <dpocekay@cityofpetaluma.org>; Janice Cader-Thompson <Jcaderthompson@cityofpetaluma.org>; Peggy Flynn <pfflynn@cityofpetaluma.org>  
**Subject:** Creekwood Housing Development - comments on the DEIR

--Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.--

33-1

My name is Alicia Wolff, and we have owned our home near Del Oro Park since 2015. Please consider this email my comments on the proposed Creekwood Housing Development Draft EIR. I generally support this development project, as I believe this site is well suited for residential development and I am glad that the development includes the extension of the Adobe Creek trail and installation of a pedestrian bridge. My comments are primarily related to affordable housing, bicycle and pedestrian safety along Casa Grande Road, and usership at Del Oro Park.

33-2

With respect to affordable housing, the proposed project includes the bare minimum for inclusionary housing, which is that 15% of the units (i.e., 8.85 of the 59 units) be set aside for affordable and low-income households. It is suggested - though not explicitly stated - that those units would be located on the project site. As the affordable housing crisis has reached crisis levels throughout CA and we experience the negative effects of that here in Petaluma, a project of this scale should be required to go beyond the minimum and include a number closer to 25% inclusionary housing (14.74 units).

The Draft EIR should explicitly state whether the units will be provided on site, and that they would be integrated throughout the site plan design (as opposed to grouped in one area). The Draft EIR should examine an additional Alternative, which is a modified Affordable Housing Alternative that includes either 25% inclusionary housing on site OR 15% inclusionary housing on site with an additional 10% as contribution to the affordable housing development fund, which funds affordable housing development in Petaluma.

33-3

The proposed project does not include any improvements to Casa Grande Road, despite adding many new residents as well as new road connections that will generate additional pedestrians and bicyclists from the surrounding neighborhoods, which will likely use it to access Casa Grande HS and nearby Wiseman Park. Casa Grande Road's current design is suited to the primarily agricultural area that previously existed here. Cars travel at high speeds, and unfortunately, vehicle-pedestrian accidents are frequent along this corridor. The Safe Routes to School study identified a number of proposed measures to increase pedestrian safety, and the recently-constructed residential development adjacent to the project site installed one of those measures (a new lighted pedestrian crosswalk). Due to the rapidly changing character of this area, with higher-density residential construction and new road connections that will generate additional pedestrian and bicycle trips to Casa Grande HS, transit stops, and nearby recreational amenities, the City of Petaluma should be implementing traffic calming measures along Casa Grande Road. With respect to this development project, the developer should be required to include some design measures to increase bicycle and pedestrian safety along Casa Grande Road, such as a Class IV separated bicycle lane.

33-4

My final comment relates to the increased usership at Del Oro Park that the proposed project will result in. In the short time since the approximately 35 residential units adjacent to the project site was constructed we have seen increased usership at Del Oro Park, which I find wonderful. There is more vitality surrounding the park, with more pedestrians on Del Oro Circle, dog walkers, children playing and people enjoying the tennis courts. The proposed project will certainly add to that usership. Therefore, any developer fees that go to Parks and Recreation should be directed to improvements at Del Oro Park. The park is in need of bathroom facilities, as it routinely hosts soccer games and t-ball games for young children, as well as a larger playground.

33-5

The CEQA process is such a valuable process for identifying key concerns to ensure that development occurs in a responsible, well-planned way. Let us make sure that the Creekwood Housing Development includes all of the elements that will allow it to become a wonderful addition to Southeast Petaluma.

Thank you.

Alicia Wolff  
[REDACTED] Petaluma





## **LETTER 33: ALICIA WOLFF**

---

### **Response to Comment 33-1**

The comment is an introductory statement and does not address the adequacy of the Draft EIR. Please see Master Response 1.

### **Response to Comment 33-2**

Please see Response to Comment 24-6.

### **Response to Comment 33-3**

Please see Master Response 3.

### **Response to Comment 33-4**

Please see Response to Comment 24-4.

### **Response to Comment 33-5**

The comment does not address the adequacy of the Draft EIR. Please see Master Response 1.



**Letter 34**

**City of Petaluma, California**

**Memorandum**

---

Community Development Department | Planning Division  
11 English Street, Petaluma, CA 94952  
(707) 778-4470 | [PetalumaPlanning@cityofpetaluma.org](mailto:PetalumaPlanning@cityofpetaluma.org)

---

DATE: October 2024

TO: Reney Planning & Management

FROM: Olivia Ervin and Brian Oh

SUBJECT: Summary of Public Comment Received on the Creekwood DEIR at the 9.10.24 PC Public Hearing

---

The following summarizes the comments received during the PC public hearing on the Draft EIR for the proposed Creekwood Housing Project:

PC Members:

- Changes to CEQA checklist and why parking or shade shadow are not part of the analysis
- Adequacy of the setback from the Creek in protecting riparian habitat
- Analyze alternative locations for the proposed bridge
- Traffic is a problem with Casa Grande Highschool, and improvements should be considered as part of the Project
- Request to include a feasibility analysis of the affordable housing alternative including incentive findings, grant options, etc., as well as the effectiveness of the affordable housing options in reducing VMT impacts
- Request to understand Casa Grande Road improvement options to make it safer for pedestrians
- Clarification on the operational usage of the bridge and expand impact analysis to address use

Members of the Public (3 public speakers):

- General Support or Opposition to the Project
- Concern related to parking standard (too little) and spill over into the MacKenna Subdivision
- Parking is insufficient and should be considered as an environmental impact
- Highschool traffic creates unsafe conditions as driver are unsupervised minors
- Trash receptacles should be provided



**Letter 34**

- The public walkway through McKenna is not designed for high volume
- Alternative bridge locations should be considered and the No Bridge Alternative is preferred
- The EIR is missing information from the perspective of the people that live in the area
- High school students hop fences and have had fires in the creeks
- The bridge will introduce trash and debris that will impact fish and the environment
- The new crosswalk on Casa Grande installed as part of the McKenna improvements is more dangerous
- The proposed pathway is too narrow to accommodate volume of use associated with high school
- Most direct path of travel is through the McKenna neighborhood to the bridge.
- Traffic congestion and safety on Casa Grande is a concern and the project will make it worse

Attachment: Planning Commission Draft Minutes September 10, 2024



## **LETTER 34: PLANNING COMMISSION DRAFT EIR COMMENT HEARING**

### **Response to Comment 34-1**

Please see Master Response 5, and Response to Comment 9-1.

### **Response to Comment 34-2**

Please see Master Response 4, and Response to Comment 30-7.

### **Response to Comment 34-3**

Please see Master Response 2.

### **Response to Comment 34-4**

Please see Master Response 3.

### **Response to Comment 34-5**

Please see Response to Comment 24-6, as well as direction provided by City Council during 9.16.2024 Public Hearing directing that further assessment of affordable housing alternative is not warranted for this project.

### **Response to Comment 34-6**

Please see Master Response 3.

### **Response to Comment 34-7**

Please see Master Response 2. In regards to operations of the bridge, the Draft EIR analyzed impacts from use and maintenance of the proposed bridge.

### **Response to Comment 34-8**

Please see Master Response 1.

### **Response to Comment 34-9**

Please see Master Response 5.

### **Response to Comment 34-10**

Please see Master Responses 1 and 5.

### **Response to Comment 34-11**

Please see Master Responses 1 and 3.

### **Response to Comment 34-12**

The comment does not address the adequacy of the Draft EIR and is noted for the record.

### **Response to Comment 34-13**

The comment does not address the adequacy of the Draft EIR and is noted for the record. Please also see Master Response 2.

### **Response to Comment 34-14**

Please see Master Response 2.



**Response to Comment 34-15**

Please see Master Response 1.

**Response to Comment 34-16**

Please see Master Response 1.

**Response to Comment 34-17**

The biological resources analysis contained in the Draft EIR appropriately evaluates potential impacts to special-status species.

**Response to Comment 34-18**

The comment does not address the adequacy of the Draft EIR and is noted for the record. Please also see Master Response 3.

**Response to Comment 34-19**

The comment does not address the adequacy of the Draft EIR and is noted for the record.

**Response to Comment 34-20**

The comment does not address the adequacy of the Draft EIR and is noted for the record.

**Response to Comment 34-21**

Please see Master Response 3.





**Letter 35**

**City of Petaluma, California**

**Memorandum**

---

Community Development Department | Planning Division  
11 English Street, Petaluma, CA 94952  
(707) 778-4470 | [PetalumaPlanning@cityofpetaluma.org](mailto:PetalumaPlanning@cityofpetaluma.org)

---

DATE: October 2024

TO: Reney Planning & Management

FROM: Olivia Ervin and Brian Oh

SUBJECT: Summary of Public Comment Received on the Creekwood DEIR at the 9.16.24 CC Public Hearing

---

The following summarizes the comments received during the City Council public hearing on the Draft EIR for the proposed Creekwood Housing Project:

**Council Members:**

- Direction to prepare a Final EIR addressing comments and return to Council
- DEIR adequately analyzes affordable housing alternative
- Direction to further investigate alternative locations for the proposed bridge
- Existing parking concerns could be addressed by considering parking enforcement and parking permits
- Shade and Shadow studies not warranted since the project is compliant with General Plan and Zoning

**Members of the Public (11 public speakers):**

- General Support or Opposition to the Project
- Security of the Bridge safety of residents, users, and the environment
- Bridge will impact animal species like deer and family of foxes that have been observed
- Concern that HOA will not be sufficient to maintain the bridge
- Preference for bridge to be City owned and maintained and that security options be explored
- Interest in seeing the riparian corridor enhancement and further restored
- Concern that new buildings will cast shadow on the Senior Apartment's Garden
- Bridge will undo years of restoration work carried out the United Anglers
- In addition to tree preservation and replanting, replacement should also incorporate native ground cover plantings



**Letter 35**

- Quality of the public pathway is inadequate and will be further degraded by increased use from bridge connection
- Concern with policing issues and trespassing

Attachment: City Council Minutes September 16, 2024



## **LETTER 35: CITY COUNCIL DRAFT EIR COMMENT HEARING**

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### **Response to Comment 35-1**

The comment does not address the adequacy of the Draft EIR and is noted for the record.

### **Response to Comment 35-2**

The comment does not address the adequacy of the Draft EIR and is noted for the record.

### **Response to Comment 35-3**

Please see Master Response 2.

### **Response to Comment 35-4**

Please see Master Response 5.

### **Response to Comment 35-5**

Please see Response to Comment 9-1.

### **Response to Comment 35-6**

Please see Master Response 1.

### **Response to Comment 35-7**

Please see Master Response 1.

### **Response to Comment 35-8**

Please see Master Response 4. The biological resources analysis contained in the Draft EIR appropriately evaluates special-status species. Deer and fox in Sonoma County are not considered special-status, warranting consideration pursuant to CEQA.

### **Response to Comment 35-9**

Please see Response to Comment 13-6.

### **Response to Comment 35-10**

Please see Master Response 1.

### **Response to Comment 35-11**

Please see Master Response 4.

### **Response to Comment 35-12**

Please see Response to Comment 9-1.

### **Response to Comment 35-13**

Please see Master Response 4.

### **Response to Comment 35-14**

Please see Master Response 4.



**Response to Comment 35-15**

The comment does not address the adequacy of the Draft EIR, is noted for the record, and will be forwarded to the other decisionmakers for their consideration.

**Response to Comment 35-16**

Please see Master Response 1.



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### **3. Mitigation Monitoring and Reporting Program**

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## **3. MITIGATION MONITORING AND REPORTING PROGRAM**

### **3.1 INTRODUCTION**

Section 15097 of the California Environmental Quality Act (CEQA) requires all State and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a “mitigated negative declaration” or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the 270 and 280 Casa Grande Road Creekwood Housing Development Project (proposed project). The intent of the MMRP is to ensure implementation of the mitigation measures identified within the EIR for the proposed project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMRP shall be funded by the applicant.

### **3.2 COMPLIANCE CHECKLIST**

The MMRP contained herein is intended to satisfy the requirements of CEQA as they relate to the EIR prepared for the proposed project. This MMRP is intended to be used by the City of Petaluma staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the EIR.

The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA Guidelines, Section 15370, as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The intent of the MMRP is to ensure the implementation of adopted mitigation measures. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by the City of Petaluma. The table attached to this report identifies the mitigation measures, the monitoring action for each mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action. The applicant will be responsible for fully understanding and



effectively implementing the mitigation measures contained within the MMRP. The City will be responsible for monitoring compliance.

### **3.3 MITIGATION MONITORING AND REPORTING PROGRAM**

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The following table indicates the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.



MITIGATION MONITORING AND REPORTING PROGRAM						
270 and 280 Casa Grande Road Creekwood Housing Development Project						
Impact Number	Impact	Mitigation Measures		Monitoring Agency	Implementation Schedule	Sign-off
4.1 Biological Resources						
4.1-1	Have a substantial adverse effect, either directly or through habitat modifications, on special-status plant species.	4.1-1	<p><i>Prior to initial ground-disturbing activities, special-status plant surveys shall be conducted by a qualified biologist in areas proposed for disturbance during the blooming season in accordance with the USFWS Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants, the CNPS Botanical Survey Guidelines of the California Native Plant Society, and CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. A report summarizing the results of the special-status plant surveys shall be submitted for review and approval to the City of Petaluma Community Development Department. If special-status plant species are not found, further mitigation shall not be required.</i></p> <p><i>If special-status perennial species are found within the proposed impact area, such as Sanford's arrowhead, the plants shall be dug up and transplanted into a suitable avoided area on-site (or elsewhere as appropriate to facilitate greatest success of transplanting) prior to construction. If the plant found is an annual, such as Pacific Grove clover, then mitigation shall consist of collecting seed-bearing soil and spreading it into a suitable</i></p>	City of Petaluma Community Development Department  CDFW	Prior to initial ground-disturbing activities	



<b>MITIGATION MONITORING AND REPORTING PROGRAM</b> <b>270 and 280 Casa Grande Road Creekwood Housing Development Project</b>					
Impact Number	Impact	Mitigation Measures	Monitoring Agency	Implementation Schedule	Sign-off
		constructed wetland at a mitigation site. If special-status plants would be impacted, as determined by a qualified biologist, a mitigation plan shall be developed and submitted for review and approval to the City of Petaluma and California Department of Fish and Wildlife (CDFW). Mitigation for the transplantation and/or establishment of rare plants shall result in no net loss of individual plants after a five-year monitoring period.			
4.1-2	Have a substantial adverse effect, either directly or through habitat modifications, on western bumble bee.	<p>4.1-2(a) If feasible, initial ground-disturbing activities associated with the proposed project (e.g., grading, vegetation removal, staging) shall take place between September 1 and March 31 (i.e., outside the colony active period) to avoid potential impacts on western bumble bee. If completing all initial ground-disturbing activities between September 1 and March 31 is not feasible, then at a maximum of 14 days prior to the commencement of construction activities, a qualified biologist with 10 or more years of experience conducting biological resource surveys within California shall conduct a preconstruction survey for western bumble bees in the area(s) proposed for impact.</p> <p>The survey shall occur during the period from one hour after sunrise to two hours before sunset, with temperatures between 65 degrees Fahrenheit and 90 degrees Fahrenheit, with low wind and zero rain. If</p>	<p>City of Petaluma Community Development Department</p> <p>CDFW</p>	If completing all initial ground-disturbing activities between September 1 and March 31 is not feasible, then at a maximum of 14 days prior to the commencement of construction activities	



<b>MITIGATION MONITORING AND REPORTING PROGRAM</b> <b>270 and 280 Casa Grande Road Creekwood Housing Development Project</b>					
Impact Number	Impact	Mitigation Measures	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>the timing of the start of construction makes the survey infeasible due to the temperature requirements, the surveying biologist shall select the most appropriate days based on the National Weather Service seven-day forecast and shall survey at a time of day that is closest to the temperature range stated above. The survey duration shall be commensurate with the extent of suitable floral resources (which represent foraging habitat) present within the area proposed for impact, and the level of effort shall be based on the metric of a minimum of one person-hour of searching per three acres of suitable floral resources/foraging habitat. A meandering pedestrian survey shall be conducted throughout the area proposed for impact in order to identify patches of suitable floral resources. Suitable floral resources for western bumble bee include species in the following families: Asteraceae, Fabaceae, Rhamnaceae, and Rosaceae, as well as plants in the genera Eriogonum and Penstemon.</i></p> <p><i>At a minimum, preconstruction survey methods shall include the following:</i></p> <ul style="list-style-type: none"> <li><i>Search areas with floral resources for foraging western bumble bees. Observed foraging activity may indicate a nest is nearby, and therefore, the survey duration</i></li> </ul>			





<b>MITIGATION MONITORING AND REPORTING PROGRAM</b> <b>270 and 280 Casa Grande Road Creekwood Housing Development Project</b>					
Impact Number	Impact	Mitigation Measures	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>shall be increased when foraging western bumble bees are present;</i></p> <ul style="list-style-type: none"> <li><i>If western bumble bees are observed, watch any special-status western bumble bees present and observe their flight patterns. Attempt to track their movements between foraging areas and the nest;</i></li> <li><i>Visually look for nest entrances. Observe burrows, any other underground cavities, logs, or other possible nesting habitat;</i></li> <li><i>If floral resources or other vegetation preclude observance of the nest, small areas of vegetation may be removed via hand removal, line trimming, or mowing to a height of a minimum of four inches to assist with locating the nest;</i></li> <li><i>Look for concentrated western bumble bee activity;</i></li> <li><i>Listen for the humming of a nest colony; and</i></li> <li><i>If western bumble bees are observed, attempt to photograph the individual and identify it to species.</i></li> </ul> <p><i>The biologist conducting the survey shall record when the survey was conducted, a general description of any suitable foraging habitat/floral resources present, a</i></p>			



<b>MITIGATION MONITORING AND REPORTING PROGRAM</b> <b>270 and 280 Casa Grande Road Creekwood Housing Development Project</b>					
<b>Impact Number</b>	<b>Impact</b>	<b>Mitigation Measures</b>	<b>Monitoring Agency</b>	<b>Implementation Schedule</b>	<b>Sign-off</b>
		<p><i>description of observed western bumble bee activity, a description of any vegetation removed to facilitate the survey, and their determination of if survey observations suggest a western bumble bee nest(s) may be present or if construction activities could result in take of western bumble bee. The report shall be submitted to the City of Petaluma Community Development Department prior to the commencement of construction activities.</i></p> <p><i>If western bumble bees are not located during the preconstruction survey, then further mitigation or coordination with the CDFW is not required.</i></p> <p><i>If any sign(s) of a bumble bee nest is observed, and if the species present cannot be established as a common bumble bee, then construction shall not commence until either (1) the bumble bees present are positively identified as common (i.e., not a western bumble bee), or (2) the completion of coordination with CDFW to identify appropriate mitigation measures, which may include, but not be limited to, waiting until the colony active season ends, establishment of nest buffers, or obtaining an Incidental Take Permit (ITP) from CDFW.</i></p>			



<b>MITIGATION MONITORING AND REPORTING PROGRAM</b> <b>270 and 280 Casa Grande Road Creekwood Housing Development Project</b>					
Impact Number	Impact	Mitigation Measures	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>If western bumble bees are located, and after coordination with CDFW take of western bumble bees cannot be avoided, the project applicant shall obtain an ITP from CDFW, and the applicant shall implement all conditions identified in the ITP. Mitigation required by the ITP may include, but not be limited to, the project applicant translocating nesting substrate in accordance with the latest scientific research to another suitable location (i.e., a location that supports similar or better floral resources as the impact area), enhancing floral resources on areas of the project site that will remain appropriate habitat, worker awareness training, and/or other measures specified by CDFW.</i></p>			
		<p><b>4.1-2(b)</b> <i>If western bumble bees are identified on-site by a qualified biologist, the following provisions shall be implemented to offset the loss or disturbance of foraging habitat (native forbs and shrubs): plant species that are known nectar sources of the western bumble bee shall be replaced at a 2:1 ratio, or as otherwise recommended by a qualified biologist and CDFW, and shall be included in a revised landscaping plan. The revised landscaping plan shall be submitted to the City of Petaluma Community Development Department for review and approval prior to commencement of construction activities. Plant species shall be sited in</i></p>	<p>City of Petaluma Community Development Department  CDFW</p>	<p>Prior to commencement of construction activities, if western bumble bees are identified on-site</p>	



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		concentrated locations selected in consultation with a qualified biologist and CDFW, as necessary, to ensure the long-term survival of such plants and to limit disturbance throughout project operation. Plant species known to benefit the western bumble bee include, but are not limited to, Asteraceae, Fabaceae, Rhamnaceae, and Rosaceae, as well as plants in the genera Eriogonum and Penstemon. If western bumble bee are not identified on-site, the requirements of this measure shall be limited to the inclusion of native plant species in the aforementioned taxonomic families within the project landscaping plan, to the satisfaction of the City of Petaluma Community Development Department.			
4.1-3	Have a substantial adverse effect, either directly or through habitat modifications, on anadromous fish.	4.1-3(a) Construction activities within 50 feet of Adobe Creek (Creek) shall be conducted outside of the known salmonid winter and fall runs (known to occur from November to April for the project region). Prior to issuance of grading permit, the foregoing provision shall be noted on the final improvement plans, which shall be subject to review and approval by the City of Petaluma Community Development Department. The City shall also coordinate with the National Oceanic and Atmospheric Administration (NOAA) Fisheries/West Coast Region to obtain its concurrence that the language is	City of Petaluma Community Development Department  NOAA	Prior to issuance of grading permit.	



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		<p><i>acceptable, prior to approval of final improvement plans.</i></p> <p>4.1-3(b) <i>Prior to the commencement of construction, standard erosion-control best management practices (BMPs) shall be implemented around the proposed disturbance areas. A qualified biologist shall be present during installation of the BMPs to ensure special-status wildlife species are not harmed during installation or become entrapped within the disturbance area. The BMPs shall be included in the final improvement plans and subject to review and approval by the City of Petaluma Community Development Department. The City shall also coordinate with the NOAA Fisheries/West Coast Region to obtain its concurrence that the BMPs are acceptable, prior to approval of final improvement plans.</i></p> <p>4.1-3(c) <i>Implement Mitigation Measures 4.1-7(a) and 4.1-7(b) and Mitigation Measures 4.1-8(a) through 4.1-8(c).</i></p>	<p>City of Petaluma Community Development Department</p> <p>NOAA</p> <p>See Measures 4.1-7(a) and 4.1-7(b) and Mitigation Measures 4.1-8(a) through 4.1-8(c)</p>	<p>Prior to the commencement of construction and prior to approval of final improvement plans</p> <p>See Measures 4.1-7(a) and 4.1-7(b) and Mitigation Measures 4.1-8(a) through 4.1-8(c)</p>	
4.1-4	Have a substantial adverse effect, either directly or through habitat modifications, on foothill yellow-legged	4.1-4(a) <i>Within 14 days prior to the commencement of construction (including tree trimming and removal), a qualified biologist approved by the U.S. Fish and Wildlife Service (USFWS) and/or CDFW</i>	City of Petaluma Community Development Department	Within 14 days prior to the commencement of construction (including tree	





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	frog, California red-legged frog, and northwestern pond turtle.	<p><i>shall conduct preconstruction surveys of all areas proposed for ground disturbance within suitable habitats for special-status species, including foothill yellow-legged frog (FYLF), California red-legged frog (CRLF), and northwestern pond turtle. The preconstruction surveys shall occur in areas within and adjacent to the project site to determine if the foregoing special-status species are present and shall not be completed more than five days prior to the initiation of grading activities in habitats where FYLF, CRLF, and northwestern pond turtle have potential to occur. A report summarizing the results of the preconstruction surveys shall be submitted for review and approval to the City of Petaluma Community Development Department.</i></p> <p><i>If any special-status species are found, the qualified biologist shall contact the CDFW (and USFWS) to determine whether relocation and/or additional exclusion buffers are appropriate. If CDFW approves relocating the animal(s), the qualified biologist shall be given sufficient time to move the animal(s) from the work site before work construction activities begin.</i></p> <p><i>Following construction activities, results from any sensitive species surveys shall be documented in a memorandum and provided to the City of Petaluma</i></p>	<p>CDFW</p> <p>USFWS</p>	trimming and removal)	



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		<p><i>Community Development Department within 30 days following the end of construction activities, or sooner, if requested by City staff.</i></p> <p>4.1-4(b) <i>If disturbance is to occur within the ordinary high-water mark (OHWM) of the Creek, the project applicant shall complete Section 7 consultation with the USFWS and the National Oceanic and Atmospheric Administration (NOAA) Fisheries/National Marine Fisheries Service (NMFS) for potential impacts to federally listed species, prior to the commencement of construction. Proof of compliance with the foregoing provisions shall be documented and submitted for review and approval to the City of Petaluma Community Development Department.</i></p> <p>4.1-4(c) <i>Within 14 days prior to the commencement of construction activities, exclusionary fencing shall be installed along the work area boundary, as determined by a qualified biologist. Exclusionary fencing shall act as a barrier to keep special-status species from entering the work area. An Exclusionary Fence Plan shall be prepared by a qualified biologist and subject to review and approval by USFWS/CDFW and the City of Petaluma Community Development Department. The Exclusionary Fence Plan</i></p>	<p>City of Petaluma Community Development Department</p> <p>USFWS</p> <p>NOAA/NMFS</p> <p>City of Petaluma Community Development Department</p> <p>USFWS</p> <p>CDFW</p>	<p>Prior to the commencement of construction, if disturbance is to occur within the ordinary high-water mark (OHWM) of the Creek</p> <p>Within 14 days prior to the commencement of construction activities</p>	



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		<p><i>shall include, but not necessarily be limited to, the following components:</i></p> <ul style="list-style-type: none"> <li><i>a. Areas approved for grading and clearing shall be delineated with suitable fencing materials and dimensions (such as temporary high-visibility orange-colored fence or silt fence at least four feet in height, flagging, or other barriers and buried to a depth of at least four inches) to act as a barrier to keep special-status species from entering the project site. Signs shall be posted that clearly state that construction personnel and equipment are excluded from the marked area. The fencing shall be inspected and approved by a qualified biologist and maintained daily until all construction activities are complete. The fencing shall be removed only when all construction equipment is not on-site any longer. Construction activities shall not take place outside the delineated project site.</i></li> <li><i>b. To avoid attracting predators, food-related trash shall be kept in closed containers and removed daily from the exclusion zone.</i></li> <li><i>c. At the end of each day, all construction-related holes or</i></li> </ul>			



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		<p>trenches deeper than one foot shall be covered to prevent entrapment of special-status species.</p> <p>d. Prior to the commencement of daily construction activities, all conduits and pipes shall be inspected for the presence of animals. Removal of any animals shall be done in consultation with the approved qualified biologist.</p> <p>e. Prior to the commencement of construction, any vegetation removed prior to the start of construction activities shall be placed away from sensitive species exclusion areas so that cut vegetation does not remain once exclusionary fencing is installed. All removed non-native, invasive vegetation shall be discarded off-site and away from aquatic resources to prevent reseeding.</p>			
		<p>4.1-4(d) Within 14 days prior to the commencement of construction, a qualified biologist shall conduct an Environmental Awareness Training session to familiarize all construction personnel with identification of special-status species and associated habitats, general provisions and protections afforded by the federal Endangered</p>	City of Petaluma Community Development Department	Within 14 days prior to the commencement of construction	



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		<p><i>Species Act (FESA) and California Endangered Species Act (CESA), measures implemented to protect such species, actions to be taken if protected species are observed on-site, and a review of project site boundaries and job site maintenance protocols (i.e., worker-generated trash, worker vehicle and construction equipment parking, and disposal of construction wastes). All personnel shall sign an affidavit acknowledging participation in the training and understanding species legal status, penalties for violations, and all protective measures. A wallet-sized card or fact sheet handout shall be distributed to all crews on-site. Proof of completion of the training for all on-site personnel shall be kept on-site and submitted for review and approval to the City of Petaluma Community Development Department.</i></p> <p>4.1-4(e) <i>During project construction, grading activities shall cease a half-hour before sunset and shall not commence prior to a half-hour before sunrise. Grading activities shall be prohibited during rain events that meet the following conditions: within 24 hours of events predicted to deliver more than 0.2-inch of rain and within 24 hours after rain events exceeding 0.2-inch in measurable precipitation. Grading shall not occur after 0.5-inch of rain has occurred after November 1 in the year</i></p>	City of Petaluma Community Development Department	Requirements noted on improvement plans	





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		<p>construction grading work is occurring unless a one-week extension based on fair weather is approved by the City of Petaluma, CDFW, and the Regional Water Quality Control Board (RWQCB). The foregoing provisions shall be noted on the final improvement plans, which shall be verified by the City of Petaluma Community Development Department.</p> <p>4.1-4(f) Prior to the commencement of any effort to advertise or promote the sale of any of the proposed dwelling units, all promotional materials, deeds/rental agreements, etc., shall include information that informs all tenants that dogs are to be leashed at all times within development boundaries, including within 50 feet of the riparian habitat within the study area, in order to ensure that sensitive resources and riparian habitat are preserved. Proof of compliance with the foregoing provision shall be submitted for review and approval to the City of Petaluma Community Development Department.</p> <p>4.1-4(g) Prior to the commencement of construction, the project applicant shall include a design sheet of the proposed trash enclosure and receptacles as part of the improvement plan submittal. The design sheet shall note that trash receptacles must be secured within enclosures that exclude mesopredators</p>	<p>City of Petaluma Community Development Department</p> <p>City of Petaluma Community Development Department</p>	<p>Prior to the commencement of any effort to advertise or promote the sale of any of the proposed dwelling units</p> <p>Prior to the commencement of construction</p>	



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		<i>(e.g., raccoons and coyotes) to avoid attracting and subsidizing such predators. On-site trash enclosures and receptacles shall also be routinely maintained. Inclusion of the design sheet shall be subject to review and approval by the City of Petaluma Community Development Department.</i>			
4.1-5	Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk and other nesting birds and raptors protected under the MBTA and CFGC.	<p>4.1-5 <i>During project construction, site preparation activities, including tree trimming and removal, should occur between September 1 and January 31, outside of the bird nesting season. If vegetation removal or construction begins between February 1 and August 31, preconstruction nesting bird surveys shall be conducted by a qualified biologist within seven days prior to vegetation removal or ground-disturbing activities to determine the presence or absence and location of nesting bird species. A report summarizing the results of the preconstruction nesting bird surveys shall be submitted for review and approval to the City of Petaluma Community Development Department. If a lapse in construction activity occurs for more than seven consecutive days or if construction activity is phased at the work site, preconstruction and nesting bird surveys shall be repeated.</i></p> <p><i>If active nests are present within 500 feet of construction areas, temporary protective construction exclusion zones</i></p>	City of Petaluma Community Development Department	If construction occurs between February 1 and August 31, within 7 days prior to vegetation removal or ground disturbing activities	



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		<p><i>shall be established by a qualified biologist in order to avoid direct or indirect mortality or disruption of the birds, nests, or young. The appropriate buffer distance shall be dependent on the species, surrounding vegetation, and topography and shall be determined by a qualified biologist, but shall be a minimum of 500 feet for raptors and 100 feet for songbirds. Exclusion zones shall remain in place until all young have fledged or until the nest has been naturally abandoned or predated. Work may proceed if active nests are not found during surveys or once nests are determined by a qualified biologist to be inactive.</i></p> <p><i>The non-disturbance buffers may be reduced if a smaller, sufficiently protective buffer is approved by the City after taking into consideration the natural history of the species of bird nesting, the proposed activity level adjacent to the nest, the nest occupants' habituation to existing or ongoing activity, and nest concealment (i.e., whether visual or acoustic barriers occur between the proposed activity and the nest). A qualified biologist may visit the nest, as needed, to determine when the young have fledged the nest and are independent of the site or the nest can be left undisturbed until the end of the nesting season. If the nest buffer is reduced but construction activities cause a nesting bird</i></p>			



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		<p><i>to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest in a way that would be considered a result of construction activities, then the exclusionary buffer shall be increased such that activities are far enough from the nest to stop the agitated behavior. The revised non-disturbance buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with the City.</i></p> <p><i>Cleared vegetation during the nesting season shall be collected and transported off-site during each week to prevent birds from nesting in vegetative debris.</i></p> <p><i>Results from any survey for nesting birds shall be documented in a memorandum and provided to the City of Petaluma Community Development Department within 30 days following the end of construction activities.</i></p>			
4.1-6	Have a substantial adverse effect, either directly or through habitat modifications, on pallid bat.	<p>4.1-6 <i>Prior to the commencement of construction, a qualified biologist shall conduct a preconstruction survey of suitable habitat for special-status bats, including existing structures proposed for demolition or removal, that could support special-status bats, at most, 14 days prior to initiation of ground disturbance, including tree trimming and removal. A report summarizing the results of the</i></p>	City of Petaluma Community Development Department	At most 14 days prior to the commencement of construction	



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		<p><i>preconstruction survey shall be submitted for review and approval to the City of Petaluma Community Development Department. If a lapse in construction activity occurs for more than seven consecutive days or if construction activity is phased at the work site, preconstruction bat surveys shall be repeated.</i></p> <p><i>If special-status bat roosts are observed, ground disturbance within 50 feet of roosts shall be restricted to between August 31 and October 15 and between March 1 and April 15 to avoid hibernation and rearing periods. Removal of potential suitable bat roost trees shall occur over a two-day phased process with a qualified biologist present.</i></p> <p><i>In addition, if bats or evidence of bat roosting are observed, exclusionary fencing and/or construction activity avoidance limits shall be put in place. Exclusion devices may include features such as one-way exits from roost habitat and shall be installed by a qualified biologist, in consultation with CDFW, and shall not occur outside of the date ranges listed above to avoid hibernation or rearing periods.</i></p> <p><i>Following construction activities, results from any sensitive bat species survey shall be documented in a memorandum, written</i></p>			





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		<i>by the qualified biologist, and provided to the City of Petaluma Community Development Department within 30 days following the end of construction activities.</i>			
4.1-7	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 CDFW or USFWS.	<p>4.1-7(a) <i>Prior to the commencement of construction, the project applicant shall implement minimization and avoidance measures that may include, but not necessarily be limited to, preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed areas adjacent to open space areas with native seed, and installation of project-specific stormwater BMPs. Mitigation for impacts to riparian habitat may include, but not be limited to, restoration or enhancement of resources on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank, working with a local land trust to preserve land, or any other method acceptable to CDFW. Mitigation shall result in no net loss of riparian habitat. Prior to the commencement of construction, the project applicant shall apply for a Section 1600 Lake or Streambed Alteration Agreement (LSAA) from CDFW. The project applicant shall comply with any terms and conditions contained within the final LSAA for the proposed project, which may differ from the above. Written verification of the</i></p>	<p>City of Petaluma Community Development Department</p> <p>CDFW</p>	Prior to the commencement of construction	



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		<p>Section 1600 LSAA shall be submitted to the City of Petaluma Community Development Department.</p> <p>4.1-7(b) A 50-foot setback from riparian vegetation shall be established prior to the commencement of grading activities, except for construction of the stormwater outfall facilities, pedestrian bridge connection, and the off-site public multi-use pathway, where a lesser setback shall be established in consultation with a qualified biologist. Construction and staging of vehicles and equipment shall not occur within 50 feet of riparian vegetation and shall be parked only in designated staging areas. Silt fencing shall be installed along the outer edge of the project's disturbance footprint and shall remain during grading activities associated with the proposed project. The foregoing provisions shall be based on recommendations by a qualified biologist, comply with agency approval, and noted on the final improvement plans, which shall be subject to review and approval by the City of Petaluma Community Development Department.</p>	City of Petaluma Community Development Department	Noted on improvement plans prior to the commencement of grading activities	
		<p>4.1-7(c) Implement Mitigation Measures 4.1-8(b) and 4.1-10.</p>	See Mitigation Measures 4.1-8(b) and 4.1-10	See Mitigation Measures 4.1-8(b) and 4.1-10	



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4.1-8	Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	<b>4.1-8(a)</b> <i>Prior to the commencement of grading activities, a 50-foot setback from the OHWM of the Creek shall be established and noted on the improvement plans, except for construction of the stormwater outfall facilities and the off-site public multi-use pathway and bridge, where a lesser setback shall be established in consultation with a qualified biologist and applicable regulatory agencies. Construction and staging of vehicles and equipment shall not occur within the Creek channel. Silt fencing shall be installed along the outer edge of the project's disturbance footprint and shall remain during grading activities. Inclusion of the 50-foot setback from the OHWM of the Creek on the improvement plans shall be subject to review and approval by the City of Petaluma Community Development Department.</i>	City of Petaluma Community Development Department	Noted on improvement plans prior to the commencement of grading activities	
		<b>4.1-8(b)</b> <i>Prior to initiation of any ground-disturbing activities, the project proponent shall submit a formal Aquatic Resources Delineation to the USACE for verification purposes and determination as to whether the project activities will require a Clean Water Act (CWA) Section 404 permit. A copy of the USACE's determination shall be submitted to the City of Petaluma Community Development Department. If a Section 404 permit is not required, further mitigation shall not be required. If a</i>	City of Petaluma Community Development Department  USACE  RWQCB	Prior to initiation of any ground-disturbing activities	



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		<p><i>Section 404 permit is required, the project proponent shall apply for a Clean Water Act (CWA) Section 404 permit from the USACE. Waters that would be lost or disturbed shall be restored, replaced, or rehabilitated on a "no-net-loss" basis. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods acceptable to the USACE. If a Section 404 permit is required, the project applicant shall also apply for a Section 401 water quality certification from the RWQCB prior to the issuance of grading permits and adhere to the certification conditions. A copy of the Section 404 and 401 permits detailing the provisions with which the proposed project must comply shall be submitted to the City of Petaluma Community Development Department.</i></p>			
4.1-10	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or have a substantial adverse effect on the environment by converting oak woodlands.	<p><i>4.1-10 Prior to approval of the final improvement plans, the project applicant shall obtain a Tree Removal Permit from the City of Petaluma Community Development Department. In addition, all protected trees to be removed, as identified in the Tree Protection and Removal Plan prepared by Urban Forestry Associates, Inc. for the proposed project, shall be replaced in accordance with the ratios established in the Tree Replacement Calculations table in the Tree Protection and Removal Plan. All trees to be preserved and protected, as detailed in Table 2 of the Tree Protection and Removal Plan shall be preserved in</i></p>	City of Petaluma Community Development Department	Prior to approval of the final improvement plans	



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		accordance with the recommendations established therein. Proof of compliance with the foregoing provisions shall be submitted for review and approval to the City of Petaluma Community Development Department.			
<b>4.2 Greenhouse Gas Emissions</b>					
4.2-1	Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	<p>4.2-1 Prior to the approval of project improvement plans, the applicant shall implement the following measure:</p> <ul style="list-style-type: none"> <li>Consistent with BAAQMD's Transportation criterion b., a total of three EV Capable parking spaces shall be installed throughout the nine undesignated on-street parking spaces within the project site, consistent with the current CALGreen Tier 2 standards.</li> </ul> <p>Compliance with the foregoing measure shall be ensured by the City of Petaluma Community Development Department.</p>	City of Petaluma Community Development Department	Prior to the approval of project improvement plans	
<b>4.3 Hydrology and Water Quality</b>					
4.3-1	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction.	<p>4.3-1(a) Prior to issuance of grading permits, the applicant shall prepare a Storm Water Pollution Prevention Plan (SWPPP). The developer shall file the Notice of Intent (NOI) and associated fee to the State Water Resources Control Board (SWRCB). The SWPPP shall serve as the framework for identification, assignment, and implementation of Best Management</p>	<p>Director of Public Works and Utilities/City Engineer</p> <p>SWRCB</p>	Prior to issuance of grading permits	





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		<p><i>Practices (BMPs). The SWPPP shall be submitted to the Director of Public Works and Utilities/City Engineer for review and approval and shall remain on the project site during all phases of construction. Following implementation of the SWPPP, the contractor shall subsequently demonstrate the SWPPP's effectiveness and provide for necessary and appropriate revisions, modifications, and improvements to reduce pollutants in stormwater discharges to the maximum extent practicable. The contractor shall implement BMPs to reduce pollutants in stormwater discharges to the maximum extent practicable.</i></p> <p>4.3-1(b) <i>Prior to issuance of grading permits, the project applicant shall ensure that a final grading plan is prepared by a State-registered civil engineer in accordance with Petaluma Municipal Code (PMC) Chapter 17.31. The final grading plan shall include, but not be limited to, the following:</i></p> <ul style="list-style-type: none"> <li><i>A project vicinity map that shows the location of the proposed grading activities within the project site and off-site areas associated with Adobe Creek (Creek);</i></li> <li><i>The property line boundaries of the project site and off-site areas of disturbance associated with the Creek;</i></li> </ul>	City of Petaluma Public Works and Utilities Department	Prior to issuance of grading permits	



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		<ul style="list-style-type: none"><li>• All existing improvements on and adjacent to the project site;</li><li>• The existing and proposed contours of the project site and off-site areas proposed for disturbance;</li><li>• The existing and proposed drainage of the project site and off-site areas;</li><li>• The extent and manner of tree cutting and vegetation clearing, the disposal of vegetation, and the measures to be taken for the protection of undisturbed trees and vegetation in on-site and off-site areas proposed for disturbance, unless the foregoing information is provided on the final erosion and sediment control plan;</li><li>• Specifications of the proposed construction methods and materials to be used in on-site and off-site areas; and</li><li>• Any other information required by the Director of Public Works and Utilities.</li></ul> <p>The final grading plan shall be submitted for review and approval to the City of Petaluma Public Works and Utilities Department.</p>			
4.3-2	Violate any water quality standards or waste discharge requirements	4.3-2 Prior to approval of final project improvement plans, a final Stormwater Control Plan shall be submitted to the	City of Petaluma Public Works	Prior to approval of final project improvement plans	



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<b>Impact Number</b>	<b>Impact</b>	<b>Mitigation Measures</b>	<b>Monitoring Agency</b>	<b>Implementation Schedule</b>	<b>Sign-off</b>
	or otherwise substantially degrade surface or ground water quality during operation.	<i>Director of Public Works and Utilities/City Engineer for review and approval. The final Stormwater Control Plan shall be in compliance with all applicable provisions of the National Pollutant Discharge Elimination System (NPDES) Phase II MS4 General Permit (NPDES General Permit No. CAS612008, Order No. R2-2022-0018) and shall meet the standards of the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment. Site design measures, source-control measures, hydromodification management, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the improvement plans. The final plans shall include calculations demonstrating that the water quality BMPs are appropriately sized, using methodology in the CASQA Stormwater BMP Handbook for New Development and Redevelopment. The final plans shall also incorporate the proposed components for maintaining the stormwater-treatment facilities. The final plans shall be submitted to the City of Petaluma Public Works and Utilities Department for review and approval.</i>	and Utilities Department		
<b>4.4 Transportation</b>					
4.4-1	Conflict with a program, plan, ordinance, or policy, except LOS,	4.4-1 <i>Prior to issuance of grading and building permits, a construction management plan shall be prepared by the applicant for</i>	City of Petaluma Public Works	Prior to issuance of grading and building permits	



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	addressing the circulation system during construction activities.	<p><i>review and approval by the City of Petaluma Public Works and Utilities Department. The plan shall include, but not necessarily be limited to, the following items:</i></p> <ul style="list-style-type: none"> <li><i>a. Comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, including school peak times, detour signs if required, lane closure procedures if required, sidewalk closure procedures if required, cones for drivers, and designated construction access routes.</i></li> <li><i>b. Evaluation of the need to provide flaggers or temporary traffic control at key intersections along the truck route(s).</i></li> <li><i>c. Notification procedures for adjacent property owners, Casa Grande High School, and public safety personnel regarding schedules when major deliveries, detours, and lane closures would occur.</i></li> <li><i>d. Location of construction staging areas for materials, equipment, and vehicles if there is insufficient staging area within the work zone of the proposed project.</i></li> <li><i>e. Identification of truck routes for movement of construction</i></li> </ul>	and Utilities Department		



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		<p>vehicles that would minimize impacts on vehicular and pedestrian traffic, circulation and safety; provision for monitoring surface streets used for truck movement so that any damage and debris attributable to the proposed project's construction trucks can be identified and corrected by the proposed project applicant.</p> <p>f. A process for responding to and tracking complaints pertaining to construction activity, including identification of an on-site complaint manager.</p> <p>g. Documentation of road pavement conditions for all routes that would be used by construction vehicles both before and after proposed project construction. Roads found to have been damaged by construction vehicles shall be repaired to the level at which they existed prior to construction of the proposed project.</p>			
Initial Study					
V-b.	Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	<p>V-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</p>	City of Petaluma Community Development Department	If during the course of ground-disturbing activities, including, but not limited to, excavation, grading, and construction, a potentially	



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		<p>a qualified and City-approved archaeologist to adequately evaluate and determine significance of the discovered resource and provide treatment recommendations.</p> <p>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. Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire-affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).</p>		significant prehistoric or historic resource is encountered	
VII-d.	Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial	VII-1 Prior to the issuance of grading permits, the project civil engineer shall show on the final improvement plans that the project design adheres to all engineering recommendations provided in the site-	City Engineer	Prior to the issuance of grading permits	





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	direct or indirect risks to life or property?	<i>specific Geotechnical Investigation prepared for the project by PJC &amp; Associates, Inc. The recommendations incorporated into the final improvement plans shall include, but not be limited to, those pertaining to the top 18 inches of soil beneath exterior flatwork consisting of imported engineered fill; demolition and stripping; excavation and compaction; temporary slopes; and vertical loads and lateral loads of post-tension slab-on-grade foundations. Proof of compliance with all recommendations set forth in the Geotechnical Investigation shall be subject to review and approval by the City Engineer.</i>			
IX-b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	IX-1 <i>Prior to issuance of a demolition permit by the City for the on-site structure at 280 Casa Grande Road, the project applicant shall provide a site assessment that determines whether the structure to be demolished contains lead-based paint (LBP) or asbestos. If the structure does not contain LBP or asbestos, further mitigation shall not be required; however, if LBP is found, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with California Air Resources Board recommendations and Occupational Safety and Health Administration (OSHA) requirements. If asbestos is found, all construction activities shall comply with all</i>	City Engineer	Prior to issuance of a demolition permit	



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		<p>requirements and regulations promulgated through the Bay Area Air Quality Management District (BAAQMD) Asbestos Demolition and Renovation Program. The demolition contractor shall be informed that all paint on the building shall be considered as containing lead and/or asbestos. The contractor shall follow all work practice standards set forth in the Asbestos National Emission Standards for Hazardous Air Pollutants (Asbestos NESHAP, 40 CFR, Part 61, Subpart M) regulations, as well as Section V, Chapter 3 of the OSHA Technical Manual. Work practice standards generally include appropriate precautions to protect construction workers and the surrounding community, and appropriate disposal methods for construction waste containing lead paint or asbestos in accordance with federal, State, and local regulations subject to approval by the City Engineer.</p>			
		<p>IX-2 Prior to issuance of a demolition permit by the City for the on-site structure at 280 Casa Grande Road, the project applicant shall prepare an Off-Hauling and Disposal Plan that incorporates industry standard BMPs during proposed off-hauling activities associated with waste from on-site demolition activities. The following Best Management Practices (BMPs) shall be incorporated:</p>	City Engineer	Prior to issuance of a demolition permit	



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		<ul style="list-style-type: none"> <li>• During loading activities, the project contractor shall place two layers of heavy plastic sheeting (minimum thickness of six mils) beneath trucks to be used for off-hauling activities to collect any spilled soil;</li> <li>• After each truck is loaded and prior to removing the plastic sheeting, visible dust or soil spilled during loading shall be removed from the top rails, fences, tires, and all other surfaces by dry brushing methods at the point of loading;</li> <li>• Collected soil on the plastic sheeting shall be removed periodically to avoid the spreading of contaminated soil on truck tires;</li> <li>• The soil shall be transported by a licensed transporter;</li> <li>• All off-hauling trucks shall be loaded at the project site and appropriately covered (tarped), in accordance with U.S. Department of Transportation regulations;</li> <li>• Loaded trucks shall use the most direct routes to the disposal site(s) to provide the least risk of exposure to surrounding communities and avoid residential areas to the maximum extent feasible and;</li> </ul>			



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		<ul style="list-style-type: none"> <li>Any additional BMPs determined necessary by the City Engineer.</li> </ul> <p>During loading activities, the project contractor shall ensure that all applicable work practice standards set forth in Section V, Chapter 3 of the OSHA Technical Manual are followed, including appropriate precautions to protect construction workers and the surrounding community, in accordance with applicable federal, State, and local regulations, including those set forth by the Sonoma County Environmental Health and Safety Division (SCEHD) and the Department of Toxic Substances Control (DTSC). The Off-Hauling and Disposal Plan shall be subject to approval by the City Engineer.</p>			
		<p>IX-3 Prior to improvement plan approval, the project applicant shall ensure that the on-site septic systems are abandoned in compliance with applicable SCEHSD standards. Upon removal, the septic tanks shall be inspected for leaks. Should any leaks be identified, the project applicant shall conduct additional testing of soils at the location of the on-site septic systems for chemicals associated with the on-site septic systems in accordance with applicable USEPA Methods. Where concentrations exceed applicable DTSC screening levels, the soil shall be excavated and that portion of material</p>	Petaluma Planning Division	Prior to improvement plan approval	



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		<p><i>shall be transported and disposed of off-site at an appropriate Class I or Class II facility permitted by DTSC, or other options implemented as deemed satisfactory to SCEHSD. The results of soil sampling and analysis, as well as verification of proper remediation and disposal, shall be submitted to the City of Petaluma Planning Division for review and approval. Any remediation shall be completed prior to acceptance of the site improvements for that phase.</i></p> <p>IX-4</p> <p><i>Prior to improvement plan approval, the project applicant shall hire a licensed well contractor to obtain a well abandonment permit from the SCEHSD for all on-site wells, and properly abandon the on-site wells, pursuant to Department of Water Resources Bulletin 74-81 (Water Well Standards, Part III), for review and approval by the SCEHSD.</i></p>	SCEHSD	Prior to improvement plan approval	
XIII-a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<p>XIII-1</p> <p><i>The following criteria shall be included in the Improvement Plans. Exceptions to allow expanded construction activities shall be reviewed on a case-by-case basis, as determined by the Community Development Director.</i></p> <ul style="list-style-type: none"> <li><i>Limit construction hours to between 8:00 AM and 5:30 PM, Monday through Friday, and between 9:00 AM and 5:00 PM on Saturday. Construction activities</i></li> </ul>	Community Development Director	Prior to approval of improvement plans	



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		<p><i>shall be prohibited on Sundays and State, federal and local holidays;</i></p> <ul style="list-style-type: none"> <li><i>• High noise-producing activities, such as excavation and grading and construction finishing, shall only occur between the hours of 8:00 AM and 5:00 PM to minimize disruption at adjacent noise sensitive uses;</i></li> <li><i>• Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment;</i></li> <li><i>• Locate stationary noise-generating equipment (e.g., compressors) as far as possible from adjacent residential receivers;</i></li> <li><i>• Acoustically shield stationary equipment located near residential receivers with temporary noise barriers;</i></li> <li><i>• Utilize "quiet" air compressors and other stationary noise sources where technology exists;</i></li> <li><i>• The project contractor shall implement appropriate additional noise-reduction measures that include shutting off idling equipment after five minutes (as feasible) and notifying adjacent</i></li> </ul>			





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		<p><i>residences (at least one time) in advance of construction work;</i></p> <ul style="list-style-type: none"> <li><i>• Construction workers; radios shall be controlled to not exceed ambient noise levels beyond the limits of the project site boundaries;</i></li> <li><i>• Heavy equipment, such as paving and grading equipment, shall be stored on-site whenever possible to minimize the need for extra heavy truck trips on local streets;</i></li> <li><i>• Two weeks prior to the commencement of construction, notification in writing shall be provided to residents within 500 feet of the project site and if during the school year, officials at the Casa Grande High School campus, disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period; and</i></li> <li><i>• The project contractor shall designate a "disturbance coordinator" responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable</i></li> </ul>			



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		<i>measures be implemented to correct the problem.</i>			
XVIII-a,b.	<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:</p> <p>Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).</p> <p>A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant</p>	<p><i>XVIII-1 To protect buried tribal cultural resources that may be encountered during ground disturbing activities, the project shall implement Mitigation Measure V-1.</i></p>	See Mitigation Measure V-1	See Mitigation Measure V-1	



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	to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				



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# Appendix A

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DATE: November 20, 2024

TO: Greg Powell, Principal Planner

FROM: Bjorn Gripenburg, MCRP - Project Manager, Public Works & Utilities (PW&U)  
Jeff Stutsman, PE, TE - Deputy Director of Operations, PW&U

SUBJECT: Adobe Creek Trail Bridge Impacts on Active Transportation Connectivity

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We understand City Council is likely to weigh “bridge” and “no bridge” alternatives of a proposed bicycle/pedestrian bridge across Adobe Creek as part of the proposed Creekwood Housing Development project at 280 Casa Grande Road. The Public Works & Utilities Department has been asked to weigh-in on these alternatives from a mobility and active transportation perspective. Our staff believes the proposed bridge offers mobility benefits to the surrounding area that are consistent with City policies and goals.

Currently, people travelling between 1) The Grove Luxury Apartments or Spyglass Road neighborhood and 2) Casa Grande High School or any other points northwest must use Ely Boulevard South, a busy four-lane road with Class II (painted) bike lanes that is part of the Sonoma County High-Injury Network. A new bridge would enable people to travel between The Grove or Spyglass Road neighborhood along a more direct route that offers greater separation from vehicle traffic. **For both neighborhoods, the bridge reduces travel distance by approximately 1500 feet, saving five to six minutes for those walking to or from Casa Grande High School.<sup>1</sup>**

Likewise, those living on the west bank of Adobe Creek would enjoy more direct access to the Adobe Creek Trail, an existing 1.25 mile multi-use trail that runs from Ely Boulevard South to Shollenberger Park, where it connects with the planned Petaluma River Trail. Currently, people living west of Casa Grande Road must use Casa Grande Road and Sartori Drive to access Adobe Creek Trail.

The City’s Bicycle & Pedestrian Master Plan (BPMP), adopted in 2008 as an appendix to General Plan 2025, outlines policies and programs toward creating a safe, comprehensive, and integrated bicycle and pedestrian system throughout Petaluma that encourages bicycling and walking and is accessible to all. BPMP Policies and Programs that support the implementation of the bridge include the following:

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<sup>1</sup> Assuming a trip starting on the east bank of the Adobe Creek Trail near the proposed bridge location and ending at the main entrance to Casa Grande High School.

- Policy 6: Ensure that new development provides connections to and does not interfere with existing and proposed bicycle facilities.
- Policy 11: Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel. At the minimum, Class I standards shall be applied unless otherwise specified.
  - Program E: Build new river (upstream of navigable waters) and creek crossings for bicycles and pedestrians to provide greater connectivity and more efficient cross-town routes.
- Policy 12: Require all new development and those requiring new city entitlements with “frontage” along creeks and the river to permit through travel adjacent to creeks and the river with access points from parallel corridors spaced at minimum intervals of 500 - 1,000 feet.

The City is currently in the process of updating the BPMP and has received several public comments around the importance of and potential to improve Adobe Creek Trail into a safe, convenient, and accessible linkage that facilitates walking, bicycling, and rolling for people of all ages and physical abilities. The trail is bookended to the south by 500 acres of publicly-accessible wetlands and to the north by Petaluma Adobe State Historic Park, with residential neighborhoods, schools, services, and a major employment district nearby.

Constructing a bridge across Adobe Creek Trail at this location is a unique opportunity that will greatly improve the trail’s utility and the overall connectivity for people travelling outside of cars in southeast Petaluma. In addition to the policies noted above, we believe the bridge will support the City’s adopted goals of eliminating severe injuries and deaths from traffic (Vision Zero) and achieving carbon neutrality by 2030.



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## **Appendix B**

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DATE: September 12, 2024

TO: Greg Powell, Principal Planner

FROM: Bjorn Gripenburg, MCRP - Project Manager, Public Works & Utilities (PW&U)  
Jeff Stutsman, PE, TE - Deputy Director of Operations, PW&U

SUBJECT: Casa Grande Road Design

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We understand the proposed Creekwood Housing Development project at 280 Casa Grande Road has generated public dialogue in which nearby residents have expressed concerns around current and future traffic and parking conditions on Casa Grande Road, primarily from Sartori Drive to Ely Blvd. South.

PW&U's Engineering/Capital Improvement Program and Traffic Engineering/Operations Divisions have identified the reconstruction of Casa Grande Road as a priority in the coming years (tentatively scheduled for 2027, pending future City Council budget adoption), which will present an opportunity to improve safety and mobility options on the corridor.

Currently, the section of Casa Grande Road near the proposed development consists of two lanes in each direction, a two-way left turn lane/median, unprotected (Class II) bike lanes in each direction, and on-street parking in the southbound direction only. There is no on-street parking along the proposed project frontage or neighboring properties. There is an existing crosswalk with a Rectangular Rapid Flashing Beacons (RRFB) and refuge island located just south of the Casa Grande High School driveway.

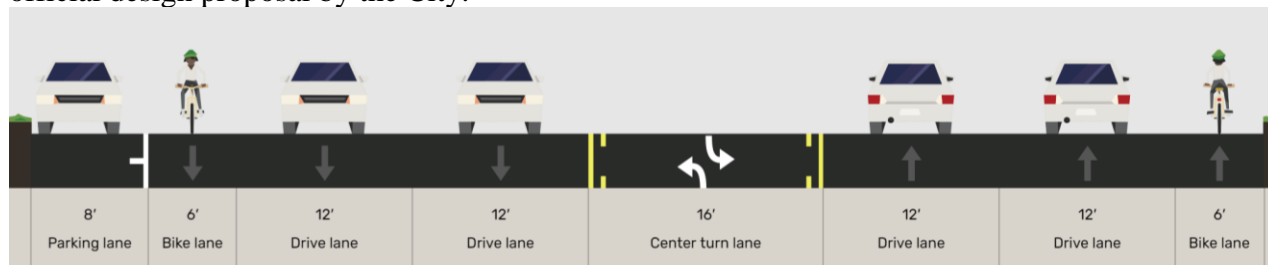
While we have not yet conducted widespread community engagement on this project, we have received considerable input on the corridor through other planning efforts and initial conversations with Casa Grande High School administration. In June 2024, our Safe Routes to Schools Task Force conducted a traffic safety audit at Casa Grande High School and discussed possible improvements to the corridor. Even at this preliminary stage, we feel comfortable sharing our strong recommendation to implement a 5-to-3 lane reduction on Casa Grande Road and reallocate roadway width to provide on-street parking and protected (Class IV) bike lanes in both directions.

The addition of protected (Class IV) bike lanes in both directions would meet the National Association of City Transportation Officials' guidance for a bikeway that is safe and appealing to people of all ages and ability levels, as envisioned in the City's draft Active Transportation Plan. The addition of on-street parking would provide a physical barrier for people on sidewalks, contribute to traffic-calming throughout the corridor, and help meet the neighborhood's growing parking needs.

Additionally, the lane reduction would reduce speeding, weaving, and other dangerous driving behavior that is more likely to occur on streets with multiple lanes in each direction. All road

users would benefit from improved crossing conditions, having to cross just one lane in each direction. As with all paving projects, our team will look for opportunities to improve existing crosswalks and add new ones to facilitate safe, accessible, and convenient pedestrian circulation. According to the Federal Highway Administration, lane reductions are typically implemented on streets with current and future average daily traffic of 25,000 or less; our data for Casa Grande Road indicates volume is significantly lower, at under 10,000 vehicles per day.<sup>1 2</sup> It should be noted that Casa Grande Road already reduces to one lane in each direction just north of the project site at the Ely Boulevard South roundabout, so a lane reduction would not lead to any additional delay at the intersection. It is our strong belief that current unsafe behavior by Casa Grande Road users is not a function of traffic volume, but rather the multi-lane configuration, which introduces far more potential conflicts and, as noted above, creates opportunities for unsafe and unpredictable driving behavior.

The cross sections below illustrate what could be possible through reducing and narrowing vehicle lanes and reallocating that roadway width to other uses, such as on-street parking and protected bike lanes. These are for illustrative purposes only and not intended to convey an official design proposal by the City.



*Existing conditions (facing northbound; school to left and project site to right)*



*Potential configuration with lane reduction (facing northbound; school to left and project site to right)*

PW&U's Engineering/Capital Improvement Program and Traffic Engineering/Operations Divisions are committed to being fully transparent throughout the design process and actively engaging with neighborhood and community members, as well as the High School. We look forward to advancing this project and its anticipated construction in 2027. As we get closer to implementation, community members will be notified of several opportunities to provide feedback on the project through postcards to properties on and near Casa Grande Road, the City's Community Update e-newsletter, and a project webpage with an email sign-up form.

<sup>1</sup> [https://highways.dot.gov/sites/fhwa.dot.gov/files/Road%20Diets\\_508.pdf](https://highways.dot.gov/sites/fhwa.dot.gov/files/Road%20Diets_508.pdf)

<sup>2</sup> [https://safety.fhwa.dot.gov/road\\_diets/resources/pdf/roadDiet\\_MythBuster.pdf](https://safety.fhwa.dot.gov/road_diets/resources/pdf/roadDiet_MythBuster.pdf)